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...ADMINISTRATION OF THE LOBBY  
REGISTRATION PROVISION







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ADMINISTRATION OF THE LOBBY  
REGISTRATION PROVISION

OF THE  
LEGISLATIVE REORGANIZATION ACT  
OF 1946,

AN ANALYSIS OF EXPERIENCE DURING  
THE EIGHTIETH CONGRESS

BY

W. BROOKE GRAVES

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## PREFACE

The House Select Committee on Lobbying Activities, created pursuant to House Resolution 298 of the Eighty-first Congress, was authorized and directed by the House of Representatives to investigate "all lobbying activities," including activities of agencies of the Federal Government, "intended to influence, encourage, promote, or retard legislation."

Shortly after the committee was appointed by the Speaker and before it actually began its work, our attention was called to the existence of a limited-edition comprehensive report made by the Library of Congress on the Administration of the Regulation of Lobbying Act based on experience during the Eightieth Congress.

Although the House Select Committee on Lobbying Activities does not at this time and prior to full investigation and hearings endorse any of the views or conclusions expressed in this Library of Congress study of the problem we are now investigating, our committee feels that this report can be useful both to us and to all Members of Congress, and for that reason we have arranged to have it made more generally available in this form.

FRANK BUCHANAN,  
*Chairman, House Select Committee on Lobbying Activities;*





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## CHAPTER I

### LOBBYING ACTIVITY DURING THE EIGHTIETH CONGRESS

#### HISTORICAL BACKGROUND

Washington is literally deluged with lobbyists. There are dozens of them, scores of them, hundreds of them. The statement that has often been made, that there are as many lobbyists as there are Congressmen, is a gross understatement of fact. There are, actually, not twice as many but three times as many lobbyists who registered during 1947 and 1948 as there were Members of the Senate and the House of Representatives combined. It is true that some who registered would probably not be obliged to do so under any reasonable interpretation of the law; but, on the other hand, it is clearly evident that there were many organizations which should have registered that did not. Registrations during the first session of the Eightieth Congress totaled 973, while by the end of the second session the total had risen to approximately 1,500.

The presence of an ever-increasing number of paid representatives of special-interest groups of every conceivable kind has been a matter of concern to Members of Congress and to students of American Government for years. As far back as 1913, President Wilson is reported to have said that lobbyists in Washington were so thick that you couldn't throw a brick without hitting one. The movement for the registration of lobbyists began in the States many years ago. In 1905 under the leadership of the elder Robert M. La Follette, the State of Wisconsin adopted the first Lobby Registration Act. Numerous others have been adopted in other States in the intervening years, during which several proposals were made for congressional action along the same lines.<sup>1</sup> While serious consideration was given to some of these proposals, none of them received approval until the Lobby Registration Act was incorporated as title III of the Legislative Reorganization Act of 1946. It is interesting to observe that Robert M. La Follette, Jr., sponsor of this measure on the Senate side (with A. S. Mike Monroney on the House side), thus succeeded in incorporating into the Federal law a provision similar to that enacted in his home State under the leadership of his father some 40 years before. If the new act accomplished nothing more than to bring into the open some portion of the operations of this horde of representatives of special interests, it would certainly have justified its existence.

From these introductory observations, it is clear that the basic problem is not of recent origin, nor for that matter is it localized in

<sup>1</sup> For a good summary of this legislative history, see Zeller, Belle, *The Federal Regulation of Lobbying Act*, *American Political Science Review*, April 1948, pp. 239-271.

any one place.<sup>2</sup> The right of citizens or of representatives of organized groups of citizens to confer with their elected representatives, discussing current problems and expressing their views thereon, is a basic right guaranteed by the Constitution of the United States, article I of the Bill of Rights of which provides that "Congress shall make no law \* \* \* prohibiting \* \* \* the right of the people \* \* \* to petition the Government for a redress of grievances." Such discussion, however, is a vastly different thing from putting pressure upon representatives, "turning on the heat," so to speak, to compel them under penalty of the loss of their political lives to support measures designed to protect the interests, or confer special benefits upon the members, of some powerful and well-organized minority.

It is the purpose of this study to present a fairly broad and comprehensive picture of the operation of the new lobby-registration law during the first 2 years of its existence. This period coincides with the life of the Eightieth Congress. There are a good many legal problems which inevitably accompany enactments of this character, whether at the State or the Federal level. It is important, furthermore, to determine as accurately as possible how the law actually operated, what defects that operation reveals, and, upon the basis of that evidence, to suggest ways and means of improving and strengthening the law for the future.

#### DETERMINING EXTENT OF COMPLIANCE

The first major problem, the one with which this chapter is primarily concerned, is that of determining the extent of compliance. The attempt to provide any satisfactory answer to this question requires consideration of a number of other questions of methodology and procedure, as, for instance, the question as to what constitutes a pressure group. In the absence of any generally accepted definition of this term, the author has proceeded upon the basis of his own belief that it includes any organization of citizens, large or small, that was organized to promote, or that may on occasion find it desirable to promote, its own interests by attempting to influence legislation. This may be done either through paid representatives or by voluntary workers. Obviously, the number of such organizations is legion; while excellent lists of them have been compiled in the past, no up-to-date list suitable for use in connection with the present study was available.

It has been necessary, therefore, to build up a new list, making use of such previous lists and information from other sources as are available. The nature of these sources and the procedure followed in the construction of this list are set forth here in some detail because

<sup>2</sup> "United States lobbies active at sessions of UN," reports the New York Times, October 31, 1948, in a story from Paris, which runs in part as follows:

"Through their own corps of special representatives at the United Nations General Assembly meeting here, several million United States farmers, union members, professional workers, and men and women engaged in scores of other fields are maintaining a watchful lobby that helps shape the official United States position.

"These agents—numbering about 65—represent about 125 organizations, such as the Farm Bureau Federation, the Congress of Industrial Organizations, the Lions International, and the Federal Council of Churches. They send home full reports weekly and semiweekly.

"From their own press headquarters in the Roccoco Hotel d'Iena, which also is the headquarters of the United States delegation, they do more than send reports, however. As spokesmen for vast blocks of persons in the United States, they play an active role in the regular conferences of delegation chiefs.

The list itself is of little value and is subject to various kinds of misinterpretation unless the reader has a clear conception of what it is and what it is not.

Several previous attempts to compile a list have been restricted to organizations maintaining a Washington office. While maintenance of such an office may be regarded as *prima facie* evidence of an intention on the part of an organization to avail itself of the opportunity which Washington affords to maintain connections with Members of Congress, it is by no means an inevitable or indispensable adjunct of lobbying work. The first list compiled on this basis appeared in 1929 in E. Pendleton Herring's *Group Representation Before Congress*.<sup>3</sup> This list could not be relied upon now because of its age; it was revised, however, and brought up to date in 1941, by Donald Blaisdell.<sup>4</sup> Although numerous changes have occurred in the meantime, it was possible to make some use of this second list. The United States Department of Commerce published, in 1942, a compilation of the names and addresses of trade and professional associations.<sup>5</sup> At the time this study was prepared, this list was in process of revision, being expanded to include other types of organizations that might be of interest, but the new data were not available for checking purposes.

The full list which was developed in this study contains the names of over 1,800 individuals and organizations classified under 27 different categories, according to type of organization or subject matter involved. While in the process of compilation, some use was made of the lists mentioned above. The present list was derived chiefly from three sources:

1. *Washington telephone directory*.—A thorough check was made of the Washington telephone directory, using such key words as American, association, Federal, national, etc. This produced a list of a little more than 500 organizations.

2. *Lobby registrations*.—The registrations under the lobby law made during 1947 and 1948 have been classified according to the character or major interest of the group concerned. The results of this classification were checked against the list from the telephone directory, with the result that it was possible to insert in the master list the names of numerous organizations which for some reason or other did not register or did not feel that they were required to do so.

3. *Committee appearances*.—In order still further to develop the total coverage of the list, it was thought advisable to check, at least on a sampling basis, appearances before committees of the two Houses of Congress. The author is aware, of course, that the law itself provides, in section 308, that the provisions of the law "shall not apply to any person who merely appears before a committee of the Congress of the United States in support of or opposition to legislation." The fact remains, however, that in a large number of cases organizations whose representatives do appear to testify or to submit statements to committees of the Congress are active pressure groups, engaged, at least in part, in lobbying activities.

Pp. 276-283 (Brookings Institution, Washington, 1929).

*Economic Power and Political Pressures* (TNEO Monograph No. 26, Washington, 1941).

Judkins, C. J., *Trade and Professional Associations of the United States* (Washington, 1942).

Since the checking and correlating of all appearances before all committees of both Houses of Congress during the 2-year period of the life of a Congress would constitute an enormous chore, it was decided for several reasons to select as a sample the Judiciary Committees of the two Houses. They are among the more important committees in each House. They handle a very large volume of legislation, probably a good deal more than their fair share, as compared with other committees. The bills referred to them, furthermore, cover a wide range of subject matter. For these reasons, it was felt that the hearings of these two committees would provide as good a sample as could be readily obtained. The results of this check have been incorporated in a series of tables. In a great many cases it was found that the organizations for whom appearances were made had registered. There were many, however, that were not registered and whose names, therefore, were added to the list.

While the complete list is impressive for its size, it definitely is not, and does not pretend to be, an all-inclusive and comprehensive list of interest and pressure-group organizations.<sup>6</sup> While it does contain the names of all, or practically all, of the more important ones operating on a Nation-wide scale as of 1948, its coverage of minor national organizations is by no means complete. Its coverage of State organizations includes only these few which showed up very largely as a result of the checking of the appearances before the two Judiciary Committees. For practically every State group whose name appears in this list, there are parallel groups in each of the other States. To attempt to gather and list the names of all of these organizations would represent a task of tremendous size and difficulty, the work on which is already well under way at the Department of Commerce. If completed, it is not believed that it would make any significant contribution to the purposes of the present report.

Because of the enormous bulk of the complete list which runs well over 100 pages, it has not seemed feasible to reproduce more than selected portions of it in the appendix of this report. This has been done on the basis of the belief that a properly selected sample would be more helpful to the reader than the entire list. The group lists selected are as follows:

- Agriculture
- Business—general
- International
- Labor—private
- Real estate: Building and construction
- Veterans and military

These particular groups have been chosen either because of a continuing interest in the subjects they represent or because interest

<sup>6</sup> The new Department of Commerce list provides information for more than 3,000 national organizations. Mr. C. J. Judkins, Chief, Trade Associations Division, Office of Domestic Commerce, provides the following estimates as to the total number of organizations:

Type of group	National	Local
Labor.....	150.....	40,000 to 50,000.
Agriculture.....	150.....	14,000 to 15,000.
Commerce.....	Over 3,000.....	Approximately 20,000.

The Department of Labor publishes a list of national organizations in that field. The Department of Commerce list, which is most comprehensive, includes all other important types.

groups in these particular fields were especially active during the sessions of the Eightieth Congress. Problems relating to agriculture are always important, and the representatives of major groups such as the National Grange, the Farm Bureau Federation, and the Farmers Union are always present. Business, likewise, is always represented by the chambers of commerce and the manufacturers' associations. Representatives of a large number of labor groups are always on hand. Problems relating to veterans have long been significant and have been especially so since the conclusion of World War II. The prominence of lobbyists in the international fields and of real-estate groups at the national level represents a relatively recent development. International questions were particularly important during the Eightieth Congress, the discussion and final adoption of the European recovery program and of the measure relating to displaced persons calling forth an unprecedented effort on the part of groups interested in foreign affairs. The urgency of the housing situation throughout the country generally, and the consideration of measures calling for Federal assistance in a broad program for housing construction, similarly called forth tremendous efforts on the part of the real-estate and building-construction lobby.

At this point, attention may appropriately be given to the figures presented in table I, which deals with registrations during the Eightieth Congress, classified by type of organization. The number of organizations included in the series of tables was approximately 1,800. Of these, we were able to find record of the registration of 667 during the first session, and of 724 during the second session. There is considerable overlapping between the two groups, and the total is considerably less than that claimed by the enforcement officers.<sup>7</sup> Of the organizations whose names got into our list, nearly half did not—so far as we could discover—register in either year. Of the nearly 400 appearances before the Judiciary Committees, only about 100 were from organizations that had registered as lobbyists. The data from this larger table, which relates to the specific groups selected for inclusion in this report, are brought together below in table II; this, it will be noted, represents a fair-sized sample from the total tabulation.

TABLE II.—*Summary table: Data for 6 selected types of organizations*

Organizations		Registered		Not registered either year	Committee appearances
Type of—	Number of—	1947	1948		
Agriculture.....	51	31	26	12	9
Business: General.....	78	29	39	29	15
International.....	58	10	14	37	6
Labor: Private.....	104	54	49	35	28
Real estate.....	45	14	12	28	5
Veterans and military.....	53	21	22	22	6
Total.....	389	159	162	163	69

It is well to keep constantly in mind the fact that it is impossible for anyone to make a dogmatic statement regarding the degree of compliance given the Lobby Registration Act during its first 2 years.

<sup>7</sup> This is due not only to annual registrations but to the fact that some organizations register separately each individual in their employ, while others register once, including all employees engaged in legislative activity. This tabulation is on the basis of organizations.



## 6 ADMINISTRATION OF THE LOBBY REGISTRATION PROVISION

Examination of the selected tables in the appendix and of the summary table covering registration of all types during the Eightieth Congress will give some idea of the extent to which organizations and individuals in particular fields of activity undertook to comply with the provisions of the law. In the absence, however, of absolutely complete lists of national organizations, it would be impossible to compute percentages of compliance in any one of these fields or in all of them combined.

TABLE I.—*Summary table: Registrations during the 80th Cong., classified by type of organization*

Type of organization	Number of organizations	Registered		Not registered either year	Committee appearances	Committee appearances of organizations not registered
		1947	1948			
Agriculture.....	51	31	26	12	9	1
Business: general.....	78	29	39	29	15	9
Citizen organizations:						
Civil and Political.....	115	53	57	39	16	8
Economic.....	38	9	7	25	6	5
Education.....	34	7	10	24	6	5
Financial.....	49	24	22	20	10	6
Food and beverage.....	96	44	48	30	5	3
Health.....	28	3	6	20	2	2
International.....	58	10	14	37	6	4
Labor:						
Government employees.....	30	21	18	7	1	1
Private.....	104	54	49	35	28	12
Lumber and forest products.....	30	10	7	18	1	
Official (governmental).....	113	8	14	96	12	65
Oil, gas, and metal products.....	107	46	57	28	16	10
Power and communications.....	41	22	23	5	3	2
Printing and publishing.....	34	6	8	24	22	19
Professional.....	117	14	12	103	44	2
Real estate: building and construction.....	45	14	12	28	5	5
Religious.....	42	10	10	28	12	9
Tax groups.....	42	23	30	2	2	1
Textiles and apparel.....	34	15	12	19	17	15
Trade groups: miscellaneous *.....	129	56	61	39	20	14
Transportation:						
Air.....	17	5	10	4	2	1
Highways.....	34	8	14	19	7	5
Rail.....	96	60	57	23	32	17
Water.....	30	12	20	8	7	4
Veterans and military.....	53	21	22	23	6	3
Welfare.....	28	16	15	8	0	0
Women's organizations.....	30	14	13	14	20	11
Individuals †.....	107	22	31	59	60	59
Total.....	1,807	667	725	835	392	298

\* Limited to Senate and House Judiciary Committees only.

† These are specialized groups, as contrasted with general over-all groups included in "Business: general."

‡ Single individuals, operating alone, and probably in most cases not required to register under the terms of the law.

The attempt to develop some standard that would give a reasonably adequate basis for judgment is further complicated by a peculiar and probably unfortunate phrase in the wording of the act itself. In section 307, for instance, it is provided that the law applies to persons who "receive money or any other thing of value to be used principally to aid, or the principal purpose of which is to aid, in \* \* \* the passage or defeat of any legislation \* \* \* [or] to influence, directly or indirectly, the passage or defeat of any legislation. \* \* \*". The joker here involves the use of the word "principal" and the phrase "the principal purpose." There are few organizations indeed that would be willing to admit that the primary reason for their existence was the influencing of legislation, even though when Congress is in session they may be particularly active in that regard.

Early in 1948, the National Association of Manufacturers instituted a suit designed to clear up some of these ambiguities. It charged that the act, as interpreted by the Department of Justice, violates fundamental civil rights. So far as individual paid lobbyists are concerned, the law is plain enough; this suit was designed to clarify the meaning of the law as applied to those organizations required to register and make detailed and comprehensive financial reports, if their funds were used "principally" to influence legislation.<sup>8</sup>

When the Lobby Registration Act was reported out of committee, as part of the Legislative Reorganization Act of 1946, Senator La Follette said that it did not apply to organizations whose efforts to influence legislation were "merely incidental" to the purposes for which they were formed. But the law does not set up any standards for determining whether the lobbying activities of an organization are its principal function or merely an incidental part of its activities. The decision, therefore, is largely a matter of judgment, with a wide latitude for the development of conflicting opinions as between the organization affected, the enforcement officers, and the Department of Justice.

The NAM—like many another similar organization—contends that it is primarily a service organization for its 1,600 members "with relatively little interest in lobbying as it understands that term." As will be indicated at greater length later in this report, a similar defense against compliance with the provisions of the Lobby Registration Act can be and is being offered by numerous organizations in a wide variety of different fields of activity—trade associations, labor organizations, propaganda agencies of many different types. Judicial clarification of the meaning of the act is greatly to be desired.

TABLE III.—*Number of persons on the pay roll of various types of organizations engaged in legislative work*

<b>Agriculture (7 groups with 34 representatives):</b>	
2 organizations with 2 representatives each .....	4
1 organization with 4 representatives .....	4
2 organizations with 6 representatives each .....	12
2 organizations with 7 representatives each .....	14
<b>Total .....</b>	<b>34</b>
<b>Business—general (13 groups with 40 representatives):</b>	
5 organizations with 2 representatives each .....	10
5 organizations with 3 representatives each .....	15
1 organization with 4 representatives .....	4
1 organization with 5 representatives .....	5
1 organization with 6 representatives .....	6
<b>Total .....</b>	<b>40</b>
<b>International (7 groups with 51 representatives):</b>	
3 organizations with 2 representatives each .....	6
2 organizations with 4 representatives each .....	8
1 organization with 7 representatives .....	7
1 organization with 30 representatives .....	30
<b>Total .....</b>	<b>51</b>

<sup>8</sup> If this suit should in the end succeed in accomplishing its purpose, it will be one of a very small number in the country that has so succeeded. No other test cases under the Federal law are known, but there are only three reported decisions relating to State lobby registration acts: *Commonwealth v. Aetna Life Insurance Company* (283 Ky. 803, 93 S.W. 2d 840, 1936); *Campbell v. Commonwealth* (229 Ky. 264, 17 S.W. 2d 227, 1929); *State v. Crites* (277 Mo. 194, 209 S.W. 863, 1919).

## 8 ADMINISTRATION OF THE LOBBY REGISTRATION PROVISION

TABLE III.—*Number of persons on the pay roll of various types of organizations engaged in legislative work—Continued*

Labor—private (26 groups with 103 representatives):	
12 organizations with 2 representatives each.....	24
3 organizations with 3 representatives each.....	9
7 organizations with 4 representatives each.....	28
1 organization with 6 representatives.....	6
1 organization with 10 representatives.....	10
1 organization with 12 representatives.....	12
1 organization with 14 representatives.....	14
Total.....	103
Real estate—building and construction (6 groups with 19 representatives):	
3 organizations with 2 representatives each.....	6
2 organizations with 3 representatives each.....	6
1 organization with 7 representatives.....	7
Total.....	19
Veterans and military (10 groups with 33 representatives):	
6 organizations with 2 representatives each.....	12
3 organizations with 5 representatives each.....	15
1 organization with 6 representatives.....	6
Total.....	33

## CHAPTER II

### THE APPLICATION OF THE LAW

#### PERSONS EMPLOYED AND TIME SPENT

It is exceedingly difficult to get complete and reliable information on any vital phase of the lobby system. A number of writers in the past have called attention to this difficulty. Dr. Blaisdell, for instance, concludes that "short of the subpoena power and the witness stand, it is practically impossible to obtain authentic evidence of lobbyist activities. Even when armed with such powers, congressional committees have frequently been rebuffed in their effort to get the facts from recalcitrant and evasive witnesses."<sup>1</sup> It is not apparent from an exhaustive study of the reports filed under the lobby registration law that this situation has been greatly improved.

It is impossible to tell exactly how many persons are engaged in lobby activities, even for those organizations which have attempted to comply with the law, at least in part, by formal registration.<sup>2</sup> As has been indicated in the preceding chapter, the total number of registrations filed during the first 2 years totaled 1,500. An examination of the records, however, indicates that there was no uniformity as to method of filing. In some instances, organizations employ several persons who devote some portion of their time to legislative work, but do not register these persons individually. Other organizations register for themselves as a group and individually for each of the members of their staff engaged in legislative work. In considering improvements in the text of the act, it might be advantageous to clarify the language which results in this diversity in procedure.

It has been possible to obtain from the office of the Secretary of the Senate a list of registered organizations employing more than one person, and to indicate in each instance the number of persons so employed. This information is presented in table III for each of the six types of organizations included in appendix B, from which the data are summarized. Some of the facts revealed by this table are rather interesting. One notes for instance that an organization like the Townsend National Recovery Plan, Inc., aims at a complete coverage from all the States, having on hand one representative from each State in which their organization has been developed. The total for this organization was 31 representatives, all of them paid under \$5,000, usually on the basis of a 25-percent cut on whatever funds the State organization was able to raise.

<sup>1</sup> Economic Power and Political Pressures, op. cit., p. 22.

<sup>2</sup> A newspaperman, Frederick C. Othman, wrote an article on Wild Lobbyists I Have Known (Saturday Evening Post, March 6, 1948), in which he said: "Lobbyists don't wear badges. No telling how many undercover ones, in addition to the official 900, are on the job. You hear that buzzing noise overhead? That's a blimp, circling around Washington to remind Congress that lighter-than-air craft are here to stay; provided, of course, that appropriations are forthcoming. So I suppose we can consider this airship a mechanical lobbyist, even though it also advertises automobiles and beer with neon signs on its sides."

In contrast with the Townsend group, which has been operating over a period of years, one notes an organization like the committee for the Marshall Plan To Aid European Recovery or the Citizens Committee for Displaced Persons. Both of these organizations developed spontaneously in response to an immediate problem. Both were apparently well financed and employed a significant number of legislative representatives to carry their appeal directly to the Members of Congress.

Large numbers of representatives are also noted in connection with the campaign of the National Citizens Committee for the Extension of Medical Service. The two organizations representing opposite sides of the oleomargarine tax controversy were the National Association of Margarine Operators and the National Cooperative Milk Producers Association. In parallel fashion, interest groups took opposite points of view on the housing and public-utilities questions. The reported figures in some of these instances appear to tell much less than the whole truth with regard to lobbying activities on the subjects in which the organizations are interested. This suggests that some of these organizations attempt to maintain a reputation for impartial service and information, at the same time organizing, supporting, and directing combat troops, so to speak, operating under a variety of names.

This technique was used very effectively by the American Medical Association in its opposition to any kind of comprehensive health insurance program and by the National Association of Real Estate Boards in carrying on its war on public housing. The use of such a technique not only serves to protect the permanent organization that is "master minding" the campaign, but to induce the public to believe that there exists such widespread sentiment among the people on the subject in question as to induce them to set up numerous organizations all striving for the accomplishment of the same purpose.<sup>3</sup>

Some comment should be made on the amount of time spent by representatives of organizations in the performance of "legislative duties," a euphemistic phrase used to denote what is otherwise known as lobbying. In examining the reports filed by the various organizations and individuals, one normally finds, even in the case of those groups which are known to spend a considerable amount of effort in their lobbying activities, the claim that these duties are merely incidental to the performance of other duties assigned to them and that they consume only a fractional part, and usually a very small fractional part, of their working time. In many cases, one may be inclined to question the accuracy of the claims made, but it is difficult to substantiate either the claims presented by the organizations or the doubts existing in the mind of the reader.

#### SOME REGISTRANTS ACTUALLY ADMIT LOBBYING

In this section and several of the ones which follow there are presented a few choice excerpts from the tremendous number of original

<sup>3</sup> The authenticity of these reports seems to be pretty well established. In the case of the American Medical Association, it is the National Physicians Committee for the Extension of Medical Service; for the real-estate people, the National Association of Home Builders, and other similar groups. Organizations of this type normally establish headquarters offices adjacent to the parent organization, often at the same address, use the same mailing lists, have interlocking directorates, free interchange of staff, and otherwise so conduct their affairs as to establish a strong presumption that the only difference is the difference in name.

The existence of such a tie-up has been accepted as fact in responsible quarters. On April 26, 1948, for instance, Senator Murray, of Montana, made a long and very bitter attack on the efforts of the National Physicians Committee on the floor of the Senate. (See Congressional Record of that date, pp. 4945-4949.) Albert Deutsch dealt with the same organization in similarly uncompromising terms in a series of articles appearing in PM: "Doctors Pan AMA for 'Unholy Alliance' With Propaganda Stooze" (February 3, 1948); "Editors Lash AMA Propaganda Stooze for Running 'Bribe Contest'" (April 14, 1948).

registrations and quarterly reports filed by the 1,500 individuals and organizations who registered in this 2-year period, 1947-48, under the terms of the law. No attempt has been made to compile anything even approaching a complete catalog of interesting or significant statements. The ones presented here seem for one reason or another to be significant; in substance, however, they are no different from dozens of others which might have been selected in relation to the several points discussed.<sup>4</sup>

In reading the published reports of these registrations, one cannot fail to be impressed by the almost universal regularity with which each registrant protests that he is not actually engaged, at least to any appreciable extent, in lobbying activities. In view of this fact, the reports of those few registrants who freely admit that they are engaged in lobbying become particularly interesting. A delightful illustration is found in the case of a gentleman who modestly states that he "represents the taxpayers of the United States and the United States Treasury." He further states that he is "self-employed and that he has \$165 to use as he sees fit, which fitness I use in lobbying for Public Law 601, Seventy-ninth Congress." That he finds his assignment too much for him is indicated by his further comment:

It is my desire to run the gantlet of all legislation before Congress, but with 400 plus Representatives and 90 plus Senators, the Executive, press, etc., to contact, I fall short of my objective. I do the best I can with only 24 hours in a day—holidays, et al. (McGrath, Thomas Edward, January 29, 1948, p. 758.)

The quotations below are presented alphabetically according to the names of the associations involved. It will be seen that they represent a fairly widespread variety of interests and activities, ranging all the way from a large Protestant Church group to a State association promoting water conservation. Some of these reports are quite frank, one of them amazingly so.

Joint Conference Committee on Public Relations, Baptists of the United States:

In the case of Federal aid to education, I did write letters and send literature to some Congressmen urging amendment to Taft and McCowen bills with a view to amending said bills so as to prevent application of Government tax funds to nonpublic schools; also, in response to official resolutions adopted by Northern and Southern Baptist conventions, I appeared before Senate Military Committee in opposition to universal military training. In addition, I attended citizens' committees in behalf of admitting displaced persons and renewing Reciprocal Trade Agreements Act, following which I wrote a few letters to congressional committees in behalf of these measures (Dawson, Joseph Martin, July 26, 1948, p. 9557).

#### Independent Bankers Association:

(Secretary receives salary of \$6,500 per year. Total membership dues for this quarter, \$19,831.25. During the quarter, association has disbursed \$8,476.90.)

We circularize bankers in support or in opposition to certain bills. We occasionally appear in Washington in support or opposition to certain bills. \* \* \* On February 24 and 25 we had a representative from each of 28 States, including my secretary, a total of 30. We discussed the association's affairs, planning for the future. We gave a dinner with 23 Senators in attendance, besides representatives from the three banking agencies. This association, of course, paid for the dinner; and it paid the expenses, both hotel, food, and railroad transportation for the members of the council present. Our total expenditure in connection with this meeting of the executive council was \$4,807.47.

<sup>4</sup> In accordance with the requirements of the statute, the original registrations and quarterly reports have been published from time to time in full in the Congressional Record. Such lists appeared during 1947 in the following issues: January 3, February 5, May 12, August 15, November 17; during 1948 on the following dates: January 20, May 5, July 26.

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Most of our council members called on their representatives at the Capitol. I called on one Senator and two Congressmen. We made our headquarters at the Willard Hotel. Frankly, I do not know how to make out what might be considered a proper statement for our limited lobbying activities. I do not believe the law intends that a director of an organization such as ours, calling on his own Congressman, comes in the category of a lobbyist. I believe that I come under the lobbyist category, as at times I visit Senators and Congressmen urging support of certain measures; and, further, I have on a number of occasions testified before the banking committees \* \* \* (DuBois, Ben, May 5, 1948, p. 5493).

I am perhaps employed in a dual capacity. I am secretary of the association and carry on the work of an association. I am also our Washington representative and therefore am registered as a lobbyist. I can't conceive of the necessity of listing all the general expenses of this organization. It would seem that the information required was that amount of money spent in what might be called lobbying. I was in Washington. \* \* \* I visited a few Members of the Congress, as we were interested in the passage of S. 829. We haven't put out any general circular letter, as I have been attending State banker association conventions and calling on banks generally in quite a number of States. Some of my conversations with bankers might be in the category of lobbying, as I have urged them to urge their representatives in Congress to use their influence in support of S. 829. If, under the terms of this act, this constitutes lobbying, kindly advise and I will file my expenses incident to the trips I have taken (DuBois, Ben, July 26, 1948, p. 9558).

### National Association of Cooperatives:

Employed to counteract the anti-farmer-co-op lobbying activities of the National Tax Equality Association: Vernon Scott and Loring Schuler, whether lobbying individually, as officers and employees of the National Tax Equality Association, or as a firm of organization and industry counselors claiming the National Tax Equality Association as a client; all State and local tax equality associations and all National, State, and local small-business or other association however known which are subsidized from, or contributors to, the lobbying funds of the National Tax Equality Association (Newton, B. Wayne, July 26, 1948, p. 9574).

### National Federation of American Shipping, Inc.:

Received approximately \$300 of regular salary for services performed on matters relating to legislation. The chief legislation with which my duties were concerned were House Joint Resolution 412 and House Joint Resolution 413, relating to merchant marine legislation, and H. R. 6594 and S. 2728, legislation to clarify provisions of the Wage and Hour Act; in addition to this proportion of my salary, I received as reimbursement for expenses. \* \* \*

My activities consisted of several conferences with Members of Congress who were interested in explanations of these bills and concerned with their passage. Activities also included giving information to members of industry who were likewise interested in the passage of the merchant-marine legislation and the wage-and-hour legislation and wished to discuss the principles involved in the legislation. (Schell, S. D., July 26, 1948, p. 9580. George Romney, another representative of the federation, files a substantially identical statement.)

### National Fisheries Institute, Inc.:

Spent 90 cents, taxicabs to Capitol to secure copy of tidelands water bill in Judiciary Committee; \$3.20, taxicabs to Capitol to see committee clerks and discuss Marshall plan (Steele, Raymond E., May 5, 1948, p. 5521).

### Texas Water Conservation Association:

Employed to support all legislation, both State and National, having to do with the development, conservation, protection, and utilization of Texas' land and water resources through existing State and Federal agencies; oppose all legislation creating Federal valley authorities and all legislation which seems to superimpose Federal control over State control in the distribution of the State's water resources (Sturrock, J. E., July 26, 1948, p. 9582).

## THE PECULIAR POSITION OF ATTORNEYS

In the initial stages of his work on the subject, the author was impressed with the frequency with which members of the bar, registering in behalf of their clients, claimed that the provisions of the law did not properly apply to them. They were representing their clients in the normal attorney-client relationship and were compensated therefor with a retainer and such supplementary fees as the volume of the work performed might justify. These registrants almost uniformly protested that any duties they might perform in the field of lobbying were an incidental part of their duties in behalf of their clients and that they represented a minor part of their work and of their compensation. Since the number of these instances is fairly numerous quotations from a dozen or more specific cases are presented here.

**Anacortes Shipways, Inc.:**

Our firm has been and is general counsel for Anacortes Shipways, Inc., and, to the extent we have been professionally retained, it is possible that this employment may be terminated at any time. In regard to our work in connection with Senate bill 2476 and House bill 6057, the same is limited to the second session of the Eightieth Congress (Fain, David, representing Black & Kendall, Portland, Oreg., law firm, July 26, 1948, p. 9544).

**Best Foods, Inc.:**

Registrant is not and was not employed specifically for the purpose of supporting or opposing any pending legislation, nor was registrant employed specifically for the purposes set forth in the first sentence of section 308 (a) of Public Law 601, Seventy-ninth Congress. Registrant is paid a yearly retainer for acting as legal counsel to the Best Foods, Inc., and, in addition to registrant's major duties as such counsel, registrant presented the cause of the company in respect to legislation affecting margarine, which is one of the many products manufactured by that company (Davis & Gilbert, July 26, 1948, p. 9556).

**Brown & Williamson Tobacco Corp.:**

Registrant was not and is not engaged "for pay or for any consideration for the purpose of attempting to influence the passage or defeat of legislation," except as such activities may be within the scope of his employment as counsel in all matters affecting the corporation.

It is impossible for registrant to estimate what part of his time, as an employee of the corporation, will be spent in activities covered by this registration. Registrant therefore states that the amount he is to be paid for activities covered by this registration is \$5,500, being a part of his total compensation as counsel (Yeaman, Addison, July 26, 1948, p. 9548).

**Chase National Bank:**

As stated in his registration statement on Form B, registrant does not believe he is subject to the provisions of the Federal Regulation of Lobbying Act. Registrant's Federal tax legislative work comprises only an incidental and minor part of his duties. If any of registrant's activities are subject to the provisions of the Federal Regulation of Lobbying Act, the portion of the annual retainer from the Chase National Bank that might be attributed to attention to Federal tax legislative matter based on an allocation of time was \$250 during the second quarter of 1948, and disbursements pertaining to such activities were \$11.32 (Colgan, Howard O., Jr., of Milbank, Tweed, Hope & Hadley, New York City, July 26, 1948, p. 8553).

**Cigar Manufacturers Association of America, Inc.:**

Banker, Selby & Ravenal, the law firm of which I am a partner, is employed by the Cigar Manufacturers Association of America, Inc., on an annual basis. The services we perform are general and include representations for the CMA before such Government agencies as the State Department, Department of Agri-



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culture, Department of Commerce, War Assets Administration, Bureau of Internal Revenue, etc. We receive for such services an annual retainer of \$5,000, payable quarterly. No portion of any payment received from the CMA has been or can be readily allocated to such service as we have rendered in matters relating to legislation in which the CMA is interested; namely, H. R. 4986 (Selby, John A., May 5, 1948, p. 5519).

Firm receives \$15,000 a year, payable on a quarterly basis, no part of which was expended for any of the purposes specified in the Lobbying Act. The Association concluded it was advisable for counsel to prepare and file memoranda with the Ways and Means Committee indicating the need for revision of the excise taxes on cigars. Some members of the committee were interviewed to explain and amplify the memoranda. No compensation as such has been paid for this service (Singer, Leon, May 5, 1948, p. 5518.)

### B. F. Goodrich Co.:

Receive annual retainer from the B. F. Goodrich Co. for all services as its Washington counsel. Allocation of amount paid for my services between legal and legislation activities is not feasible \* \* \*

The B. F. Goodrich Co. is interested in legislation relating to the maintenance of facilities for the production of an ample supply of synthetic rubber in the United States for commercial and national defense purposes. It is interested in various proposals now under study by Congress for a long-range rubber program for this country. It is also interested in the repeal of the present excise taxes on tires and tubes and in other legislative proposals which come before Congress from time to time (Herter, Dow W., July 26, 1948, p. 9563).

### Lake Carriers' Association:

An article which I wrote, The Case Against Tolls on the St. Lawrence, appeared in the October 1947 issue of the *Cleveland*, organ of the Cleveland Chamber of Commerce. I received no compensation for the article and paid nothing for its publication \* \* \*

During this quarter I have given attention to legislation relating to Great Lakes shipping as part of my work as legal counsel for Lake Carriers' Association. I do not consider that I am engaged for the purpose of attempting to influence legislation, and this report is made without prejudice to that position (Johnson, Gilbert R., May 5, 1948, p. 5503).

### Millers' National Federation of Chicago:

I am employed by the Millers' National Federation at an annual salary of \$8,500 paid to me for a variety of services which have no relationship to the activities described in section 307 of title 3 of the Federal Regulation of Lobbying Act, Public Law 601, Seventy-ninth Congress. Any services which I may perform in connection with the activities set forth under subdivisions (a) or (b) of said section 307 would be incidental to the services which I perform for the Millers' National Federation. No specific amount of my salary is allocated for activities covered by the Federal Regulation of Lobbying Act. I estimate that such activities would take less than 5 percent of my time (Kreuger, A. H., July 26, 1948, p. 9546).

### National Association of Housing Manufacturers:

I am paid under a temporary retainer arrangement of \$600 per month. I am not employed for the purpose of supporting or opposing any particular legislation, but act as general counsel, rendering legal and informational services to the association.

As indicated above, I am not employed to support or oppose any particular legislation. Only a small part of my time is devoted to keeping members informed on pending legislation with a view to advising and assisting them on any such legislation that may be helpful or harmful to them in accomplishing their objective of producing sound, attractive, low-cost housing through modern mass-production methods and new improved building materials (Krooth, David L., May 5, 1948, p. 5505).

### National Association of Retail Grocers:

The undersigned registrant is an attorney engaged in the general practice of law. For many years have been retained as general counsel to the National Association of Retail Grocers and, in this capacity, probably 80 percent of time

normally devoted to this client is spent on legal and other work not believed to be within the scope of Lobbying Act. However, I expect to do more legislative work for the association during this session of Congress (primarily in the effort to bring about the repeal of oleomargarine taxes) and in order to be certain that I have complied with the spirit as well as the letter of the law have filed this registration (Taylor, Tyre, May 5, 1948, p. 5482).

#### National Beauty and Barber Manufacturers' Association:

Petitions printed were distributed to persons engaged in beauty and barber industry for signatures. Petitions urged Members of Congress to support H. R. 3825 which provides for the repeal of the excise tax on cosmetics used in beauty and barber shops. Bulletins urged industry members to contact Members of Congress regarding H. R. 3825 and solicit support.

Registrant is paid an annual retainer as counsel for the National Beauty and Barber Manufacturers' Association. No determinable amount of compensation is paid or received on account of legislation. Normally the total time used by him in activities covered by this law are infinitesimal. However, activity on legislation has consumed 50 percent of his time since February 25, 1948 (Reek, Jacob, May 5, 1948, p. 5516).

#### Northwest Horticultural Council of Washington State:

This employment is an ordinary attorney-client retainer for the purpose of rendering general legal advice and assistance. Considerable time is being currently spent in the preparation of materials for presentation to Congress in support of proposed legislation to improve marketing conditions in the fruit industry during the postwar interruption in normal export marketing (Barlow, Joel, July 26, 1948, p. 9550).

#### State Rights Association:

Had retainer fee of \$7,500 and expenses of \$932.32. Distributed copies of ABA Recommendation for Tax Equalization, published by the association, to attorney. We did not cause it to be published. It was the official report of the association.

Our purposes are to bring about constructive cooperation between community-property and common-law States for the development of a plan of tax equalization, whereby husbands and wives in all States may be permitted to divide their property and income, after marriage, for Federal estate, gift, and income-tax purposes in the same manner as is provided in the community-property State concept. Any such practice to be based on the ownership of their property and income, as determined by State law. This principle is stated in the recommendations of the ABA \* \* \* which has been presented before the Ways and Means Committee (Crampton, Charles J., January 29, 1948, p. 749).

#### Unemployment Benefit Advisors, Inc.:

Twenty-five hundred dollars received by Morgan & Calhoun for all services as Washington counsel for Unemployment Benefit Advisors, Inc. Allocation between legislative and nonlegislative activities is not feasible.

At irregular intervals UBA prepares and distributes to its members, public officials who administer social-security programs, and a few others, mimeographed material related to current social-security programs, including legislation. I usually prepare the material. (Calhoun, Leonard J., of Morgan & Calhoun, January 29, 1948, p. 747.)

#### Waterman Steamship Corp., Mobile, Ala.:

I am not engaged specifically "for the purpose of attempting to influence the passage or defeat of any legislation by the Congress." My employment \* \* \* is as attorney in the office of the general counsel of that corporation and its subsidiaries in Washington, D. C., and my duties of employment are the usual duties of an attorney with such a corporation. [My employers] are interested in any legislation affecting the merchant marine, the operation of aircraft, and transportation generally. This, of necessity, requires presentation of information and facts to the members of committees handling such legislation. This work is not the principal part of my employment by any means, but is just one of the many general duties in connection with my employment \* \* \* (Stoudenmire, Sterling F., Jr., July 26, 1948, p. 9548).

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### Downs, Scheib, Becker & Walsh:

Registrant firm does not believe that it is required to register or report under the act with respect to the matters contained therein (May 5, 1948, p. 5472).

### Quinlan, William A.:

Registrant believes that this registration, with some possible exceptions, is not required of him by the terms and intent of the act, but files this registration as a precaution to comply fully with the requirement to the extent if any that it might be held applicable and valid. Registrant is engaged in the general practice of law and is presently employed as a legal counsel on general retainers by the following general purpose nonprofit trade associations \* \* \*.

None of the foregoing employments is either principally for the purpose or necessarily in any part for the purpose of influencing legislation, but rather is general employment of registrant as general legal counsel or Washington legal counsel in the course of which need for attempting to influence legislation may or may not arise. In addition, registrant is presently employed by the following business concerns with particular reference to their problems under the Fair Labor Standards Act \* \* \*. [Here follows the long discussion of fees, how they will be determined, etc.]

## PECULIAR POSITION OF OFFICERS OF COMPANIES AND ASSOCIATIONS

As the analysis of the information contained in the registration forms progressed, it became evident that the attorneys were not the only group who regard themselves as being in a peculiar situation in their relations to the Lobby Registration Act. The records showed that there were in Washington, working in behalf of their respective companies and organizations, a considerable number of individuals serving in official positions in their respective organizations. These official positions ranged from president, vice president, and executive vice president, through executive director, director, secretary, secretary-treasurer to assistant to the executive vice president. All of them without exception aver that they receive their salaries of X dollars as officials of their companies and that any activity which they may perform in the field of lobbying is purely incidental, perhaps even accidental.

### Atchison, Topeka & Santa Fe Railroad Co.:

Receives nothing for legislative service. My salary as an officer of the company is \$12,000 per year. I do not directly or indirectly for any purpose solicit, collect, or receive money or other things of value from any person other than my employer; legislative activity on my part is not my principal purpose but is only occasional and incidental. Registration is made as a matter of precaution because of the vagueness and indefiniteness of the act (Putt, C. J., July 26, 1948, p. 9547).

### Honolulu Oil Corp.:

I receive no compensation earmarked for or in consideration of activities for the principal purpose of aiding or influencing the passage or defeat of legislation. However, in the absence of authoritative opinion as to what constitutes a principal purpose within the meaning of Public Law 601, I am reporting that part of my compensation may be allocated to activities in any sense related to legislative matters. It is estimated that compensation allocable to such activities will not exceed \$1,000 per annum (Mattel, H. D., president, July 26, 1948, p. 9546).

### American Petroleum Institute:

Registrant is president of the American Petroleum Institute, a national trade association of the petroleum industry. The registrant has been advised by counsel and believes that he is not now subject and has not previously been subject to the provision of the Federal Regulation of Lobbying Act \* \* \*. (Boyd, William R. Jr., May 5, 1948, p. 5470. Same statement submitted by other officials registered for Institute.)

**Association of American Ship Owners:**

During the quarter for which this report is made, registrant received only his salary and expenses; the portion of registrant's salary applicable to activities in furtherance of any object necessitating registration under Public Law 601 is estimated to be less than "\$1,250. \* \* \* expenses, \$443.18.

The registrant is employed as president of the A. of A. S. O. and is not employed to support or oppose any specific legislation; during the quarter for which this report is filed, the registrant did, however, support bills to amend the Merchant Marine Act, 1936; this is the first quarter since the effective date of the act during which the registrant has engaged in any activity in furtherance of any object necessitating registration (Morgan, George W., July 26, 1946, p. 9573).

**Federation for Railway Progress:**

(Receives \$5,000 payable in equal monthly installments.) As president, 80 percent of my duties and time are devoted to matters other than legislation concerning the railroad industry. No specific. \* \* \* The compensation which I receive \* \* \* \$10 a month. (MacMillen, William C., Jr., May 5, 1948, p. 5477).

**National Broadcasting Co.:**

Registrant's compensation covers all of his activities as vice president in charge of Washington office of NBC, including supervision of the company's Washington broadcasting operations. No specific part of such compensation is allocable to legislative matters (Russell, Francis M., January 29, 1948, p. 743).

**National Association of Broadcasters:**

Received \$4,166.67 for services from February 3, to April 1 and \$1,240.93 for expenses during same period. These amounts were received and/or expended in carrying out my normal duties as executive vice president, acting as administrative officer at the headquarters of the National Association of Broadcasters, only a small part of which duties directly or indirectly involve Federal legislation. None of this money was received or expended for the specific purpose of attempting to influence the passage or defeat of any Federal legislation (Willard, A. D., Jr., May 5, 1948, p. 5525).

**National Aviation Trade Association, Inc. (which is a federation of 42 State chapters, composed of more than 3,200 fixed base operators engaged in all phases of the aviation trades):**

Retainer for services as executive director is \$11,000 per annum, no part of which is paid for activities covered by Public Law 601, Seventy-ninth Congress (Meixell, Harry, July 26, 1948, p. 9546).

**American Petroleum Institute:**

Registrant has been advised by counsel and believes that he is not now subject and has not previously been subject to the provisions of the Federal Regulation of Lobbying Act, and that he is not now required and has not been previously required to register or to file any statements under the act.

Registrant has not engaged himself for pay for the purpose of attempting to influence the passage or defeat of any legislation by the Congress of the United States. He is employed from year to year and receives an annual salary to perform all of his duties as director of the American Petroleum Industries Committee of the American Petroleum Institute. By far the preponderant part of his duties in that position have nothing to do with Federal legislation. Registrant spent only a very small portion of his business time during the calendar year 1947 on matters relating to Federal legislation (Markham, Baird H., May 5, 1948, p. 5477).

**Federation for Railway Progress:**

(Registrant receives \$3,333.33 payable in equal monthly installments.) As secretary, 95 percent of my duties and time are devoted to matters other than legislation concerning the railroad industry. No specific part of my time and services deals with the opposition or support of railroad legislation. The compensation which I receive for time and work devoted to railroad legislation is approximately \$1.25 a month (Goddard, Livingston).

**Missouri-Kansas Businessmen's Association, Inc.:**

Appends following note to report: I am secretary-treasurer of the Mo-Kan Businessmen's Association. As secretary of this association, I may, in the future, write letters to businessmen, civic organizations, and to the public, which may encourage them to write letters to Members of Congress with regard to pending or proposed Federal legislation, including legislation relating to taxes. Although I am of the opinion that my activity has not yet come within the requirements of the Federal Regulation of Lobbying Act, since a part of my activities may include the writing of letters to Members of Congress or to encourage the members of our association to do so, I will keep the records required by the act and submit the required reports (Van Osdol, Paul., Jr., May 5, 1948, p. 5523).

**Humble Oil & Refining Co.:**

Registrant does not consider that he is employed for purposes which make him subject to Public Law 601, Seventy-ninth Congress. He is employed as assistant to the executive vice president and in such capacity from time to time may discuss legislation affecting the company's business. The registration effected hereby is made only in view of the indefiniteness of the act, and neither the registration, nor any reports that may be filed by registrant, constitute an admission that registrant is subject to its provisions.

Of his total annual remuneration, a maximum of \$3,000 might be considered applicable to services in connection with consultations with reference to legislation (Gray, David G., May 5, 1948, p. 5474).

**PECULIAR POSITION OF PUBLIC RELATIONS COUNSEL**

Some large organizations, both companies and associations, carry on their legislative work, not through the activities of their own officers and employees or through their attorneys, but rather through the agency of firms of public relations counsel. Such firms, with a large staff of employees containing specialists in every phase of the field of public relations, are accustomed to making appearances before legislative committees and contacting Members of the Congress in the interests of their clients. The representatives of this group, whose views are illustrated by the excerpts from a number of reports quoted below, emphasize the fact that the duties which they perform for their clients in the field of legislation represent only a minor portion of their total assignment. The illustrations presented here are arranged in alphabetical order according to the name of the public relations organization involved. They cover a wide range of subject matter, including Schenley Distillers and General Motors among corporations, along with such national associations as those representing the electrical utilities, homebuilders, margarine manufacturers and shippers.

**Carl Byoir & Associates, Inc., representing Schenley Distillers Corp.:**

We have been retained as public relations counsel for Schenley Distillers Corp. for more than 8 years, at a fixed fee of \$3,000 per month, plus disbursements. The fee received for the period covered by this report amounts to \$9,000. While this fee includes payment for all lobbying activities, it is the identical amount that would have been paid and received if no lobbying activities had been performed. Salaries of employees of Carl Byoir & Associates working full time on general public relations for Schenley Distillers Corp., including work on legislative matters, \$5,013.20. Charges of specialty departments of Carl Byoir & Associates for time devoted to work done on Schenley account, \$346.50. Expenses for typing, mimeographing, and mailing of material opposing limitation of grain to distillers, and opposing changes in control of liquor advertising, \$55.

Newspaper articles were distributed during the period covered by this report to approximately 300 daily and weekly newspapers in the United States (Gavitt, Fran, July 26, 1948, p. 9561).

Lee, Ivy & Ross, T. J.:

(Registrant disclaims that Public Law 601 has any application to it but is filing this form in the event that the act may be deemed to be applicable to it.) (July 26, 1948, p. 9569.)

N. W. Ayer & Son, Inc. (represents National Association of Electric Companies as publicity counsel in connection with publicity affecting the electrical industry):

The arrangement does not contemplate that registrant shall engage in lobbying as that term is commonly understood and registrant is not engaged and does not propose to engage in lobbying. Under the arrangement registrant may, however, engage in publicity work which may aid or influence the passage or defeat of legislation pending from time to time before the Congress of the United States and affecting the electric industry.

Registrant is also exposed to the risk that its publicity service, though not engaged in for the purpose of so aiding or influencing action by legislators will, nevertheless, be held to have some purpose. Registrant does not believe that its proposed activities come within the purview of the Lobbying Act and files this registration solely for self-protection and to avoid the penalties of the act and with full reservation of all rights (July 26, 1948, p. 9542).

Cortwright, Frank W., represents National Association of Home Builders:

News releases are sent to the AP, INS, UP, and other national newspaper wire services by the association for publication in subscriber papers and magazines, some of which releases may contain material deemed to affect legislation directly or indirectly. Neither the association nor I have any means of ascertaining a complete list of the publications utilizing such releases. I also write an article each month for the American Builder, a monthly publication devoted to the interests of the housing industry. The association publishes a weekly newsletter called the Washington Letter and a monthly magazine, the Correlator, containing material of interest to the membership, including information on legislative matters (January 29, p. 749; also July 26, p. 9555).

Burnett, Leo Co., Inc., represents National Association of Margarine Manufacturers:

A portion of this sum (\$77,142.26) spent during preceding quarter not definitely ascertainable was for purposes referred to in section 307, Public Law 601 of the Seventy-ninth Congress. The reason for not being able to specify the exact amount used for so-called lobbying purposes is that we handled advertising generally for the margarine association. Not only in some of our advertising not directed at the effective legislation at all, but individual advertisements may be partially what may be termed general advertising and partially an appeal to support the Margarine Association's position in the legislative matters referred to (July 26, 1946, p. 9553).

Rudy, John Forney, director of public relations for National Federation of American Shipping:

It is not believed that the duties performed as director of public relations come within the scope of Public Law 601, Seventy-ninth Congress. However, this registration is being filed in order that there may be compliance with the act in the event it is interpreted to cover such activities (July 26, 1948, p. 9547).

#### PECULIAR POSITION OF LEGISLATIVE REPORTERS

A considerable number of firms and organizations find it advantageous to maintain a Washington office. In many cases these offices are small, being established primarily for the convenience of having a mailing address and telephone number. In other cases, where a considerable staff is employed, it is apparently the custom to have this office headed by a fairly high-salaried individual who serves in the capacity of Washington representative for the organiza-

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tion in question. Among the duties assigned to such an individual is that of serving as legislative reporter for his company or association. Making his permanent headquarters in Washington, he is expected to know his way around and to be able to secure promptly up-to-the-minute information regarding subjects of interest to his employers. In many cases, this man is responsible for incorporating the information that he is able to pick up into some kind of bulletin or news letter prepared for limited distribution, such as to company officers and field offices or the paid membership of an association. As in the case of the members of the other special categories heretofore mentioned, these men regularly state their contention that the duties which they are performing may not be properly classified as lobbying. By way of illustration, excerpts from the reports filed by some five or six registrants who fall in this general category are presented below.

### Automobile Manufacturers Association:

Registrant is manager of Washington Reporting Service of said association and in that capacity performs a variety of services, of which those of a nature covered by the Federal Regulation of Lobbying Act will be purely incidental. The amount of compensation for any and all services to be performed by registrant of a nature covered by said act is \$2,500 for the year 1948 (Hadley, Harlan V., May 5, 1948, p. 5474).

### Building Products Institute:

The Building Products Institute is an organization devoted to economic research and analysis of trends in construction, disseminating its findings to those interested in the construction industry and to the public. However, in view of the uncertain interpretation of certain provisions of the regulation of Lobbying Act of 1946 concerning what constitutes "principal purpose" and the phrase "to influence directly the passage or defeat of any legislation, etc.," we are filing this form giving a full disclosure of the information required under the act (July 28, 1948, p. 9552).

### General Motors Corp. (Washington office):

Registrant is in charge of this office which is maintained to assist his employer and its representatives in their business relations with the various agencies of the Federal Government. Registrant believes that these activities are not within the scope of Public Law 601.

Registrant also collects information regarding and reports on proposed and anticipated action by Congress and agencies of the Federal Government for the information and guidance of his employer and its representatives, and sometimes assists in assembling information which may be submitted to Members of Congress, congressional committees or other agencies of the Federal Government. These activities, in the opinion of the registrant, are not subject to the act.

However, they are enumerated herein and the registrant is registering in order to be in compliance with the act in the event of any contrary interpretation (Mougey, William J., July 26, 1948, p. 9546).

### Independent Petroleum Association of America:

My normal duties include periodic reporting to members of the association on pending legislation. I am not employed to support or oppose any specific legislation. My duties include those of maintaining surveillance of legislation which might affect the petroleum industry and taking such action with respect thereto as may be directed by the association (Brown, Russell B., July 28, 1948, p. 9552).

### Republic Steel Co.:

No part of my compensation is earmarked for the purposes set forth in Public Law 601, Seventy-ninth Congress. My services (insofar as legislative matters are concerned) consist primarily of factually reporting the status and content of pending proposals affecting the steel industry. The maximum part of my compensation which may be allocated to services within the scope of Public Law 601 will not exceed \$5,000 per annum (Rutherford, F. S., July 26, 1948, p. 9547).

## CONCLUSIONS ON APPLICATION OF THE LAW

Having considered at some length the application of the Lobby Registration Act to a number of the major types of individuals and organizations who might reasonably be assumed to be affected by it, it seems appropriate to undertake to draw some generalizations, if not actual conclusions. The first of these would seem to be quite obvious. According to their own professed beliefs, as set forth in the statements made on the registration forms, practically none of these corporations are engaged in lobbying work. It would appear that all of them sit in their offices or in their hotel rooms and meditate, thinking pure thoughts, but never for a moment descending to anything so common and ordinary as lobbying. They might, it is true, call up a Member of Congress now and then, but this would be only incidental to their performance of other duties. They would not for one moment have anyone believe that they were engaged primarily, or even to any large extent, in legislative work. A good many of these registrations remind one of the phrase from Shakespeare's play Hamlet, "The lady doth protest too much, methinks." Part of these protestations are a pose; many of them are obviously exaggerated, if not actual deliberate distortions of the truth. Many persons, newspapermen and others whose business it is to know what goes on around the Capitol, give very different testimony than that which is contained in these filed and published reports.

In considering the application of the act, it may be noted that certain groups are clearly and specifically exempted from its coverage. It does not apply to individual citizens who may talk or write to their Congressman, expressing their views on pending legislation. It does not apply to individuals who may testify before congressional committees; perhaps it would be more accurate to say that, while many lobbyists do testify, the fact that one does testify does not make him a lobbyist, subject to the requirements of the act. Although attorneys often regard themselves as being in a privileged position, they are not so regarded by the Department of Justice. If they are paid to try to influence legislation, other than through direct testimony before a committee, they should register. Government officials are not subject to the act,<sup>5</sup> nor are newspapers or other regularly published periodicals. It has been suggested that this same immunity should be extended to include radio. A still further exemption, or at least exception, applies to persons or organizations whose practices or activities are regulated by the Corrupt Practices Act.

<sup>5</sup> This does not mean that Federal employees may engage in lobbying for or against legislation; since 1919 there has been a law on the statute books prohibiting such activity. (See 41 Stat. 68, sec. 6 (July 11, 1919), repealed and reenacted, United States Code, title 18, sec. 201 (lobbying with appropriated moneys).)



## CHAPTER III

### EXPENDITURES FOR LEGISLATIVE WORK

Reference has already been made to the highly unsatisfactory character of the information regarding the activities of lobby organizations. This is particularly true where financial data are involved, for lobbies differ not only in their practice with regard to filing but in the manner in which they handle the whole problem of expenditures. Some organizations list all expenses without distinguishing, or attempting to distinguish, between those which are made for the purpose of influencing legislation and those which are made for other purposes. Other organizations list the salaries paid to various ones of their officials and employees but attempt to allocate some fraction—almost invariably a minor fraction—of these amounts as having been spent in connection with efforts to influence legislation. Such organizations invariably state that no funds are allocated in the budget for this purpose and that the duties so performed are incidental to the discharge of the major responsibilities entrusted to the official or employee in question.

Because of the lack of uniformity in the method of reporting expenditures, it becomes exceedingly difficult to ascertain, with any degree of accuracy, the amount of money expended by any particular group or for any particular purpose. In presenting even tentative figures, the reader should clearly understand these limitations and should regard the figures only as the best available estimates. The following list presented by Prof. Belle Zeller in a recent article gives a representative sampling of the amounts reported to have been spent by associations during the first 6 months of 1947:<sup>1</sup>

TABLE IV.—*Expenditures of representative groups, January to June, 1947*

American Federation of Labor (in campaign to defeat Taft-Hartley bill) .....	\$819, 648. 18
Committee for Constitutional Government, Inc. ....	248, 505. 58
Townsend National Recovery Plan and Weekly .....	236, 599. 42
National Physicians Committee for the Extension of Medical Service .....	135, 367. 86
National Association of Electric Companies .....	126, 039. 75
National Home and Property Owners' Foundation .....	77, 333. 82
Southern States Industrial Council .....	51, 686. 95
Southern Pine Industry Committee .....	34, 988. 23
American Legion .....	29, 788. 22
Unemployment Benefit Advisors .....	25, 157. 79
American Farm Bureau Federation .....	23, 097. 12
Sea Air Legislative Committee .....	21, 326. 20
National Association of Cooperatives .....	21, 119. 35
National St. Lawrence Association .....	20, 381. 05
Central Valley Project Association .....	18, 306. 38
American Medical Association .....	15, 174. 11
Christian Amendment Movement .....	9, 875. 40
American Library Association .....	7, 990. 17
National Conference of Railroad Investors .....	7, 525. 83

<sup>1</sup> Zeller, Belle, Federal Regulation of Lobbying Act, American Political Science Review, April 1948, pp. 239-271.

TABLE IV.—*Expenditures of representative groups, January to June, 1947*—Con.

The People's Lobby.....	\$6,694. 10
National Federation of Post Office Clerks.....	6,283. 66
North Dakota Resources Board.....	4,978. 21
Western Defense Housing Co.....	4,848. 08
American Parents Association.....	3,372. 59
Federation of American Scientists.....	3,007. 67
Irrigation Districts Association of California.....	2,576. 22
American Veterans of World War II.....	494. 20
National Committee for Strengthening Congress.....	248. 20
Legislative Bureau of the Communist Party, U. S. A.....	34. 95

Comparable information from another source is available for the first 6 months of 1948, during which it was estimated that more than \$3,500,000 was spent on lobbying activities. The largest expenditures appear to have been made in connection with the fight to repeal the tax on oleomargarine. The National Association of Margarine Manufacturers reported expenditures of \$133,177, and its advertising counsel, \$167,498 (of which part was not for lobbying) during the first 6 months. On the opposing side, the National Cooperative Milk Producers Association, together with an advertising agency hired by them in cooperation with the American Butter Institute and the National Creameries Association, reported a 6-month expenditure of approximately one-half as much—\$155,444. The advertising agency—Hill and Knowlton, Inc.—whose registration statement has previously been quoted in this report, denies that it is engaged in lobbying, claiming rather that it “educates” the public on the consequences of the repeal of the oleomargarine tax.

The second largest expenditure during this period was made by the Citizens Committee on Displaced Persons, in the amount of \$286,467. In two lists which appear on page 31 are presented the names of those organizations which spent more than \$100,000 during the 6-month period of 1948 and those which spent between \$50,000 and \$100,000.<sup>2</sup>

TABLE V.—*Lobby expenditures, January to June, 1948*

MORE THAN \$100,000	
Citizens Committee on Displaced Persons.....	\$286,467
Committee for Constitutional Government, Inc.....	244,012
National Physicians Committee for the Extension of Medical Services (says doesn't lobby).....	240,727
Leo Burnett Co., Inc., Chicago, for National Association of Margarine Manufacturers—all expenses.....	167,498
National Association of Margarine Manufacturers—includes \$90,889 to Leo Burnett Co., Inc.—allocable for legislative expenses.....	133,177
National Association of Electric Companies—all expenses.....	148,354
National Association of Home Builders—all expenses.....	131,640
Committee for the Marshall Plan To Aid European Recovery.....	129,495
The National Cooperative Milk Producers Federation—all expenses.....	128,590
BETWEEN \$50,000 AND \$100,000	
Association of American Railroads—allocated.....	83,628
Independent Bankers Association—12th Federal Reserve District.....	76,694
National Small Business Men's Association.....	76,376
National Association of Real Estate Boards—Its Realtors Washington Committee and its Public Relations Department, Chicago and Dis- trict of Columbia.....	66,952
State Rights Association, Houston—including \$2,500 to ex-Represent- ative Fritz Lanham.....	66,597
Unemployment Benefit Advisors, Inc.....	57,419
National Council of Farmer Cooperatives.....	54,800
Life Insurance Policyholders Protective Association.....	50,542

<sup>2</sup> Data from Congressional Quarterly Log for Editors, August 5, 1948, p. 553.

The Congressional Quarterly from which the above data were taken lists other organizations similarly grouped, in accordance with the size of their expenditures. In the group whose expenditures range between \$25,000 and \$50,000 are listed 21 different organizations with approximately the same number reported as having spent between \$10,000 and \$25,000. Approximately 35 organizations spent between \$5,000 and \$10,000, and about 50, between \$1,000 and \$5,000. About two dozen reported that they spent less than \$1,000, and a few claim to have spent nothing at all.

In May 1948, Robert C. Albright, an able reporter for the Washington Post, pointed out that "lobbying is getting to be a pretty frank and open business under the Federal Regulation of Lobbying Act. Needless to say, it's big business."<sup>3</sup> In proof of which he goes on to describe a new and somewhat daring innovation which some people think should be prohibited by law:

Under the act, lobbyists not only have to register, they have to state how much they are being paid, by whom, and for what. But not until recently have organizations supporting the pressure boys come right out and said what they consider "successful" lobbying, and paid their help according to measurable "results."

One of the first "sliding scale" lobbyists to register is Samuel P. Haines, representing the "20 Per Cent Tax Committee," headed by Otto K. Eitel, of Chicago's Bismarck Hotel.

This group is lobbying for a cut in the 20-percent cabaret tax and means it. How much it is willing to pay Haines to get the cut is set forth with startling candor in a letter from Eitel to Haines, duly filed with the Clerk of the House and the Secretary of the Senate. The letter reads in part:

"In accordance with our agreement, you are to be paid a retainer of \$10,000 and, in addition, the sum of \$15,000 for expenses in order to bring to the attention of the Congress of the United States the necessity of a reduction in this cabaret tax.

"In the event you are successful in bringing this matter to Congress' attention by amendment, rider, or proposed legislation, there will be advanced to you an additional sum of \$25,000 for expenses to further guide and assist in any manner which you deem necessary the successful passage of this legislation on both the floor of the House of Representatives and the Senate of the United States.

"In further accordance with our agreement, in the event you are successful in having passed legislation that will reduce the cabaret tax from the present 20 percent to 10 percent, you are to be paid the sum of \$35,000 for your services. In the event the tax is reduced to 5 percent, you are to be paid the sum of \$50,000.

"You are admonished to conduct the lobbying of this legislation in strict accordance with the laws and regulations of this country and to hold in valued respect the members of this committee that you are representing. \* \* \*

Haines wasn't the first "sliding scale" lobbyist. A few months ago, Thomas J. Downs, representing the Associated Fur Coat and Trimming Manufacturers, lobbying for a 20 per cent in the fur excise tax, filed an equally revealing statement. His statement had a new wrinkle—a dead line.

Downs said he would be paid by the following rule:

"Ten thousand dollars per annum as a retainer as Washington counsel of the industry on all matters affecting the economic and legal welfare of the industry plus a fee of \$15,000 in the event the excise tax on furs is cut from 20 per cent to 10 percent, plus an additional fee of \$25,000 in the event the entire excise tax on furs is repealed on or before July 1, 1948."

For a good many years there was more or less heated discussion of the influence of money in elections. There were some who contended that the party or the candidate that spent the most money almost invariably won the election. This conclusion does not seem to be supported by the facts in most elections in recent years, but the same basic question arises in connection with lobbies. Is it true that the special-interest groups with the most money to spend come much

<sup>3</sup> May 16, 1948.

nearer to getting what they want, legislatively, than those groups that are less well off financially? While in some cases it may appear that they do, there are complicating factors to be mentioned later which enter into the situation in such a manner as to make judgments difficult. An analysis of expenditures for lobbying purposes during the Eightieth Congress, made at the conclusion of the special session by an individual who published his results of his inquiry in the *New York Times*,<sup>4</sup> points to some very interesting conclusions:

If this trend is an indication of things to come, Americans might as well become reconciled to lobbying as a permanent and flourishing adjunct of our democratic legislative process. Lobbying has grown into an industry as remunerative to its promoters as it is disturbing to the long-range public interest. It affects in a very practical sense the livelihood and status of every citizen. \* \* \* \$3,500,000 reportedly (has been) spent by congressional lobbyists during the first half of 1948. \* \* \*

According to official reports, only one-third of the registered lobbyists have listed their expenses so far. It is worthy of note that the National Association of Manufacturers has not yet filed its expenditures for the past 6 months. The United States Chamber of Commerce spent about \$85,000 in that period; the Association of American Railroads, \$83,628; and four other business organizations, \$230,000.

Table VI represents a very imperfect attempt to furnish a starting point for such correlations as may be drawn between lobbying expenditures and legislative action. The reader is cautioned that other organizations may have been involved in individual cases, and that the expenditure data is far from satisfactory.

The counterbalancing factors are not easy to identify specifically. Numerous newspaper columnists and commentators reported from day to day and from week to week on the activities of these various groups, but there appear to be few published statements from alleged entrenched interests to the effect that "we have been able to beat down the nefarious schemes of ——— group to force through ——— legislation." Another hidden factor is well illustrated in the field of labor legislation. Very substantial sums were spent by organized labor to defeat the Taft-Hartley bill while it was before Congress (the American Federation of Labor alone spent \$819,648); but, as is obvious from the record, these efforts were unsuccessful. The efforts made for and against this measure were lobbying. The groups making the expenditures were or should have been registered, but subsequently organized labor spent undetermined amounts in the electoral campaign to defeat the Members of Congress who voted for the Taft-Hartley Act. This was not lobbying; yet the basic problem—the use of money to influence the course of public policy—is the same. One's attitude toward these various approaches to the problem, whether of approval or disapproval, will be determined very largely by his own point of view.

Thomas L. Stokes, pursuing the theme that "big money talks in politics" a little later in the year, went on to describe how effective its talking had been during the preceding 2 years.<sup>5</sup> Not only had big money talked persuasively in politics in the past; but, according to items constantly appearing in the press, it is making the big plans for the future. A Pittsburgh public-relations firm which registered at the end of 1948 revealed that it is being paid the fattest salary so far paid to any registered lobbyist—\$132,000 a year, or \$11,000 a month,

<sup>4</sup> Lippett, Alexander S., on congressional lobbyists, in *Letters to the Times*, August 26, 1948.

<sup>5</sup> In his syndicated column, *A Look at the Lobbies*, November 22, 1948.

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plus all expenses. Its purpose is to try to get Congress to pass a price system that will benefit the steel concerns.<sup>6</sup>

Another current report indicates that AMA taxes doctors \$25 for war chest.<sup>7</sup>

TABLE VI.—Correlation of lobbying expenditures and legislative action

Subject	Lobbying organizations	Reported expenditures 2d sess.	Legislative action
Public Housing.....	For: CIO Housing Committee.....	\$2,500	No effective legislation passed.
	National Council of Housing Associations.....		
	National Committee on Housing, Inc.....		
	National Association of Housing Officials.....		
	National Public Housing Conference.....		
	Against: National Association of Real Estate Boards.....	66,952	
Medical.....	National Association of Home Builders.....	131,640	No action.
	National Association of Home Owners.....		
	National Home and Property Owners Foundation.....		
	For: Committee for the National Health, Inc.....	29,225	
Oleo tax.....	Against: American Medical Association.....	18,285	Do.
	National Physicians Committee for the Extension of Medical Care.....	240,727	
	For: National Association of Margarine Manufacturers (includes \$90,589 to Leo Burnett Co., Inc., for legislative expenses).....	133,177	
	Leo Burnett Co., Inc., for National Association of Margarine Manufacturers.....	167,498	
Public power development	Against: National Cooperative Milk Producers Association.....	128,590	Denied appropriation for TVA generating plant.
	For: National Rivers and Harbors Congress.....	9,540	
	Against: National Association of Electric Companies.....	148,364	
	For: Committee for Constitutional Government.....	244,012	
Business legislation <sup>1</sup> .....	Association of American Railroads.....	83,628	Numerous measures favorable to business. <sup>1</sup>
	Independent Bankers Association.....	76,694	
	Against: No general lobby, though various groups opposed individual items in program.....		
Displaced persons.....	For: Citizens Committee on Displaced Persons.....	286,467	Displaced Persons Act adopted.
	Against: None registered as opposing this legislation.....		
	For: Committee for the Marshall Plan To Aid European Recovery.....	129,495	
Marshall plan.....	National Committee for the Marshall Plan.....		Marshall plan approved by substantial majority.
	Against: Merwin Hart, National Economic Council.....		
	Wilford King, Committee for Constitutional Government.....		
	John Trevor, American Coalition of Patriotic Societies.....		
	Agnes Waters, representing the Mothers of America.....		

<sup>1</sup> Including more and better antiunion legislation, reduced appropriations for the Department of Labor and other Federal agencies, support of the Reed-Bulwinkle bill, and various other measures.

The American Medical Association announced here today it will assess member doctors \$25 each to create a \$3,500,000 war chest to fight compulsory national health insurance.

(The United Press reported tonight that the AMA campaign will be directed from an enlarged Washington office and involves hiring an expert public relations and advertising firm.)

<sup>6</sup> Jerry Kluttz's column in the Washington Post, December 9, 1948.

<sup>7</sup> Haseltine, N. W., in Washington Post, December 12, 1948. This, of course, is but a sequel to what went on before: see discussion in preceding chapter, and reference to Deutsch articles.

The action was made public even as the rift within the profession widened between sponsors and opponents of a Nation-wide, nonprofit health insurance company. \* \* \*

Today's announcement that AMA's 140,000 members would be assessed \$25 each did not designate the fund sought as a "war chest"—in those words. It stated, instead, that the money would be used "for a Nation-wide plan of education on the progress of American medicine, the importance of the conservation of health and the advantages of the American system in securing a wide distribution of a high quality of medical care."

The announcement of this plan soon produced rumblings of revolt. A noted Boston physician, twice president of the medical society of his State voiced vigorous protest against the plan,<sup>8</sup> while in another account, it was reported that "some Washington doctors are fighting mad at the AMA's forthcoming attempt to collect \$25 each from its 140,000 members for a \$3,500,000 'slush' fund to fight State medicine."<sup>9</sup>

<sup>8</sup> "AMA Revolt Seen Over Health Fight," Washington Post, December 7, 1948.

<sup>9</sup> Edwin D. Neff, "Slush' Fund Levy Splits Doctors Here," Washington Times-Herald, December 10, 1948.

## CHAPTER IV

### ADMINISTRATION OF THE LAW

It is inevitable that, in the administration of a new law, there should arise numerous questions of interpretation and procedure, perplexing alike to enforcement officers and to citizens affected by the terms of the act. While questions of this type are to be expected, the number of them in this case has been abnormally large, due to what appears to be defective draftsmanship. Many of these defects, discussed in the paragraphs which follow, were considered at length in the hearings conducted by the Senate Committee on Expenditures in the Executive Departments in the early part of 1948.

#### VAGUENESS OF THE LAW

It seems to be unfortunately true that the act is so drawn that no one who studies it is able to develop in his own mind any assurance that he knows what it means. There are two sections which impose requirements upon individuals or organizations who have collected and expended funds or who in other ways seek to influence the course of legislation in Congress. In the first of these, section 305 (for text of act, see appendix A), it is provided that such persons shall file quarterly statements containing information as to the nature and source of contributions received and of expenditures made. These reports, it is stated, shall be filed with the Clerk of the House. In section 308, it is specified that individuals or organizations engaged in an effort to influence congressional action upon legislation shall register with the Clerk of the House and the Secretary of the Senate, giving certain information specified in the law. One might reasonably assume—though it can be only an assumption—that the intent of Congress was to require all such individuals and organizations to register under section 308, thereby indicating their acknowledgment that their activities were such as to fall within the purview of the law, and that all such groups and organizations should thereafter file regularly the quarterly reports regarding their financial transactions called for in section 305.

Many difficulties arise in the interpretation of these provisions. The first of these is the use of the word "principal." There are obviously very considerable numbers, both of individuals and organizations, who expend money and effort for the purpose of influencing legislation, who would vigorously deny that this was the principal reason for the existence of their group or organization. If such a group acknowledges some responsibility under the act, to be on the safe side, does it register or file quarterly reports, or both? As a matter of fact, some groups have filed quarterly reports without registering under section 308. But others have registered without filing reports because they claimed they spent no money during a

given period, or that their activities were suspended during a given quarter. Nor can one help wondering why expense accounts are filed with the Clerk of the House while registrations are supposed to be filed both with the Clerk of the House and the Secretary of the Senate. The point is that there exists very great confusion as to the correct use of the forms A, B, and C which have been devised for the purposes of carrying out the act.

In conformity with the practice which has been followed in the preceding chapters of this report, we present here a number of statements taken from the various filed registrations and reports, expressing doubt on the part of the individuals and organizations concerned, as to whether the terms of the act apply to them and to their activities. The internal evidence would seem to indicate that in many cases these statements are drafted with considerable care. When two or more persons are registered as representing the same organization, the registration statements are couched in identical language. This occurs, for instance, in the registrations of two persons representing the Association of Casualty and Surety Companies, and in the case of two others representing the National Council of Farmer Cooperatives. Inasmuch as these groups represent a wide variety of business and civic interests, it may be assumed that these statements reflect sincere doubts on the part of their authors as to the meaning of the law.<sup>1</sup>

Curiously enough, this uncertainty as to the exact meaning of the law seems to have been present from the very beginning. Professor Zeller, who followed the comments of newspapers in various cities at the time the act went into effect, reported some commendatory statements, but more highlighting the vague terminology under such headlines as:<sup>2</sup>

New Lobby Law Spreads Confusion.

Lobbying Law Stirs Confusion in Washington—Many Puzzled Groups

Ask Lawyers If They Must Register under New Act.

Lobbying Law Goes into Effect but Exact Meaning is Not Clear.

Lobbyists Slow to Register.

What's a Lobbyist?

#### Association of Casualty and Surety Companies:

Registrant does not receive funds earmarked for purposes set forth in this act. Registrant has estimated, however, that \$150 received by registrant during the first quarter of 1948 might come within scope of act as registrant understands act has been interpreted by the Department of Justice. Registrant has also been reimbursed for out-of-pocket expenses. \* \* \*

Registrant doubts that he is employed to support or oppose legislation. However, on very infrequent occasions, he has supported or opposed legislation as it specifically affects capital stock, casualty and surety insurance companies (Starling, Howard M., May 5, 1948, p. 5521).

#### Building Products Institute:

The Building Products Institute is an organization devoted to economic research and analysis of trends in construction, disseminating its findings to those

<sup>1</sup> This vagueness is perhaps as much inherent in this type of statute as it is attributable to poor draftsmanship. A student of the Nebraska law notes that studies made of these problems in other jurisdictions, where similar legislation has been enacted, "almost uniformly reveal the inadequacy of the means for the effectuation of the desired end." He goes on to discuss some of the mealy-mouthed phrases that crept into that statute. What is "indirect promotion"? Is a banker engaged in indirect promotion when he merely invites some legislators to dinner, when bills affecting the banking business are before the legislature for consideration? When lobbying "for compensation" is prohibited, is it to be assumed that an unpaid representative is incapable of concealing the interests for which the lobbying is being done? See Wilson, Robert D., "Registration of Lobbyists," *Nebraska Law Review*, November 1947, pp. 123-125.

<sup>2</sup> Zeller, *op. cit.*, from the following sources: *New York Times*, August 10, 1946; *New York Herald Tribune*, August 4, 1946; *St. Louis Post Dispatch*, September 22, 1946; *Journal Gazette*, Fort Wayne, Ind., October 10, 1946; *Chicago Times*, September 13, 1946.



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interested in the construction industry and to the public. However, in view of the uncertain interpretation of certain provisions of the regulation of Lobbying Act of 1946 concerning what constitutes "principle purpose" and the phrase "to influence directly or indirectly the passage or defeat of any legislation, etc.," we are filing this form giving a full disclosure of the information required under the act (July 26, 1948, p. 2943).

Clear Channel Broadcasting Co. (an informal organization of 16 licensees. Registrant receives \$1,200 monthly plus fees on a per diem basis (against which the \$1,200 is credited), for work principally on contested proceedings before the FCC (and in court, if court proceedings should develop)):

Registrant states that no definite portion of the fees he is to receive are assignable to work in connection with legislation. For over 3 years he has represented Clear Channel Broadcasting Service in a proceeding before the Federal Communications Commission, which commenced February 20, 1945, and involves the same issues as a bill now pending in the Senate, S. 2331, introduced February 26, 1948. \* \* \* So far as registrant knows, it is solely in connection with this bill, and particularly the hearings thereon that registrant may have any duties of a legislative character to perform for Clear Channel Broadcasting Service. Such duties will be entirely incidental, registrant having been principally engaged to represent said organization before the FCC.

In registrant's opinion, his work in connection with said bill has not been and will not be such as to fall within the scope of the Federal Regulation of Lobbying Act; but, in order that there may be no doubt or question in the matter, he is filing this registration. The above-mentioned fees and expenses are paid to registrant's law firm and not to registrant individually. They also cover legal services by lawyers other than registrant who \* \* \* (Caldwell, Louis G., May 5, 1948, p. 5470).

Disney, Wesley E.:

(In quarterly report, does not say who he represents, but is interested in amendments to Natural Gas Act, and percentage depletion tax relief.)

For the quarter ending December 31, 1947, my total compensation for all services, including work related to legislation, was \$4,699.18. This amount is reported for the reason that it is impossible to determine from the language of Public Law 601 what part, if any, of this compensation is in consideration of services within the scope of the regulation of Lobbying Act (January 29, 1948, p. 750).

Millers' National Federation:

I am not employed for the specific purpose of influencing legislation, and therefore I do not believe that I am required by law to register. However, I am filing this registration voluntarily to remove any possible doubt.

I have been employed by the Millers' National Federation since 1925. Since 1933, I have been employed as vice president and Washington representative, subject to reemployment once a year. I am paid a salary of \$20,000 per annum as an officer of the association. Legislative work is only incidental to my duties as an officer of the association, and no part of my salary is specifically allocated for that purpose. Legislative work is estimated to require not more than 5 percent of my time (Falker, Herman, May 5, 1948, p. 5473).

National Council of Business Schools:

I do not believe that I am required to file this statement under the Lobbying Act, but do so to avoid any question concerning the application of the act (Berge, Wendell, May 5, 1948, p. 5470).

National Council of Farmer Cooperatives:

Since legislative activities form only a small part of my work, and I do not receive my salary "to be used principally to aid, or the principal purpose of which person is to aid in the accomplishment of \* \* \* the passage or defeat of any legislation by the Congress of the United States," or "to influence directly or indirectly the passage or defeat of any legislation by the Congress of the United States," I have been advised that I am not required to register under the Lobbying Act, but since neither my employer nor I have anything to conceal

with respect to my activities, I am giving such information in this registration statement as I would be required to give if I were required to register.

Salary of \$6,500 per year, which includes services of all kinds rendered by me to my employer; my complete legislative activities, much of which consists in appearing before committees of Congress, will consume less than 10 percent of my time. (Harmanson, L. James, Jr., May 5, 1948, p. 5475).

**National Cooperative Milk Producers' Association:**

(Says that he received \$5,000 a year for all services for the federation including those services, if any, as may be rendered in connection with lobbying.) (Drake, John, July 26, 1948, p. 9544.)

**National Federation of American Shipping, Inc.:**

All of registrant's time with respect to legislative activities is spent in appearing before committees or in the preparation of correspondence directed to the chairmen of such committees. Registrant is, therefore, of the opinion that the Federal regulation of Lobbying Act is not applicable to him. However this registration is being filed in order that the Congress may be fully informed of his duties with respect to Federal legislation.

Registrant believes \$166.66 per month represents a fair estimate as to the amount of his salary allocable to the activities referred to above (Krebs, Alfred U., May 5, 1948, p. 5476).

**National League of Women Voters:**

Registrant receives no contributions specifically for activities for which this registration is being filed. An extremely small portion of the activities of the registrant are such as might possibly be construed as being covered by any provision of this act (July 26, 1948, p. 9546).

**National Livestock Tax Committee:**

During the quarter the National Livestock Tax Committee paid to me a per diem of \$50 for office work and \$100 out of town for actual time spent in study, advice, conferences, and correspondence concerning general livestock tax questions including the analysis of the present provisions of the Internal Revenue Code and current rulings and decisions concerning Federal taxation of livestock operators. Such activities also included work in connection with proposal to amend the Internal Revenue Code, recognizing capital gains in sale of breeding livestock and permitting deduction of ordinary recurring ranching expenditures. It is impossible to determine what part of my services related to this problem, but it is my opinion that only a portion of my activity during the preceding quarter could be interpreted as lobbying \* \* \* (Hart, Stephen H., July 26, 1948, p. 9563).

**Retired Officers Association:**

Received \$1,250. No part of this sum was received specifically for the purpose of attempting to influence legislative action (Willenbucker, Franz Otto, May 5, 1948, p. 5525).

**Sheet Metal Workers' International Association:**

I am employed to handle my many and varied duties as international representative of the Sheet Metal Workers' International Association. My work in connection with legislation is incidental to these other duties and consumes a very small part of my time. It is confined to giving attention to legislation affecting railway employees in which we are interested (Shackelford, P. L., July 26, 1948, p. 9580).

**United Indian Traders Association (N. Mex.):**

My employment is not in any sense for lobbying, but appearance before the Congress in connection with matters involving my employer which necessitated appearance before a joint committee of the House and Senate on proposed legislation of \$90,000,000 for Navajo Indians. My first work is to advise and represent the traders on the Navajo Reservation in their dealings with the Bureau of Indian Affairs and the Navajo Tribal Council (Carr, Ralph, July 26, 1948, p. 9553).

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### United States Business Organizations, Inc.:

\$3,000 as straight salary—\$12,000 for the year 1947. All items of expenditure that have anything whatsoever to do with lobbying, even remotely, are listed on the attached sheet which is made a part of this report. These expenditures all represent telephone charges, expenditures for telegrams, taxicabs, travel and hotels, letters, pamphlets, mimeographing, etc. (Dixon, Karl S., January 29, 1948, p. 750).

### REGISTRATIONS UNDER PROTEST

In the preceding section we have noted a dozen or more cases in which registrants expressed doubt as to the application of the law to them. We are now confronted with the type of registrant whose doubt has been crystallized into a conviction in his own mind that the law definitely does not apply to him, but he is hesitant to act upon that conviction by refraining from registration, for fear of possible prosecution as specified under section 310 of the act. It cannot be said that the number of these cases is very great, but the wording of the statements is such as to indicate a considerable intensity of feeling upon the part of the authors.

Klepinger, Robert F., attorney:

Registrant has never accepted compensation for supporting or opposing legislation. Employment as counsel is accepted only under legislation requiring legal services after enactment—special acts, for example conferring jurisdiction upon Federal courts to hear and determine causes; and acts requiring proof, pleadings, arguments, etc., in matters relating to demands, claims, or determination of rights thereunder where the United States is or may be a party.

Registrant's employment as counsel in litigation and prosecution of matters thereunder is usually on a contingent basis. He does not construe the Lobbying Act as applicable to such employment and files this registration merely as a matter of public record and in view of the uncertain language of the law. Since compensation has never been accepted for supporting or opposing legislation, it is registrant's view that the filing of quarterly reports are unnecessary and not required of him (May 5, 1948, p. 5476).

### American Petroleum Institute:

The Department of Justice has nevertheless expressed the view that the registrant is subject to the act. Pending an authoritative construction of the act by the courts, the registrant is registering under the act. By doing so, however, he does not admit that he is subject to the provisions of the act or that he is required to register. Since the registrant receives a salary to perform all the duties of his employment, it is his view that he is not paid any sum for the purpose of attempting to influence Federal legislation.

For the purposes of filing the periodic statements (Form C) called for by section 308, registrant will apportion a part of his annual salary to Federal legislative purposes on the basis of his best estimate of the proportion of time spent by him on matters relating to Federal legislation. The making of any such apportionment is not to be construed as an admission that the registrant is employed for the purpose of influencing Federal legislation.

Since there is no way of determining in advance the proportion of his business time, if any, which the registrant may devote to Federal legislation, no attempt will be made at apportionment in this report. \* \* \* (Markham, Baird H., May 5, 1948, p. 5477)..

### National Cooperative Milk Producers Federation, American Butter Institute, and National Creameries Association:

Hill & Knowlton is not engaged in any lobbying activities and does not believe that it is required to register under Public Law 601. However, it has been engaged by (above organizations) to carry on certain educational activities intended to explain the consequences of proposed legislation to repeal the Federal

tax on oleomargarine. In view of announced interpretations by representatives of the Department of Justice implying that such educational activities are subject to Public Law 601, the firm is reporting receipts and expenditures for said educational campaign, pending judicial clarification of the law's intent (Ellsworth, Charles K., of Hill & Knowlton, public relations counsel, July 26, 1948, p. 9544).

National Economic Council, Inc. (the purpose of this group is to aid in developing an informed public opinion on the major political, social, and economic problems of the Nation):

The council does not in any manner whatsoever, directly or indirectly, solicit collect, or receive money or any other thing of value to be used principally to aid, nor is its principal purpose to aid, in passage or defeat of any legislation by the Congress, or to influence, directly or indirectly, passage or defeat of any legislation. Consequently nothing in this statement is to be construed as an admission that the Federal Regulation of Lobbying Act applies to it (Griffiths, Dr. H. M. July 26, 1948, p. 9545).

#### National Association of Home Builders:

As indicated in my original registration, I have been advised by counsel that I am not subject to the Lobbying Act. Such registration and this report are therefore filed under protest and merely as a matter of personal precaution in view of the indefiniteness of said act and the lack of judicial interpretation thereof. Neither said registration nor this report in any way are intended to constitute an admission by me that I am subject to the act. The payments reported above as my salary and per diem are for general services as executive vice president of the National Association of Home Builders, and are not dependent upon rendition of services which might be considered lobbying within the meaning of the act. Similarly, expenses reported include substantial amounts for routine association business which could not be regarded as lobbying within the meaning of the act \* \* \*.

I am not employed to support or oppose any legislation, but I am the executive vice president of the trade association for the home-building industry. In that capacity, it is incumbent upon me to supervise, among other things, the association's legislative department. The function of that department of the association is to follow all legislation affecting the home-building industry; to advise the membership of the association of all such legislation; and to make known to the public and to the Congress the opinion of the membership on all such legislation (Cortwright, Frank W., July 26, 1948, p. 9555).

#### PUBLICATION OF MATERIALS—SIGNIFICANT REGISTRATIONS AND FAILURES TO REGISTER

Section 308 specifies that each registrant shall report "the names of any papers, periodicals, magazines, or other publications, in which he has caused to be published any articles or editorials, and the proposed legislation he is employed to support or oppose." An examination of the registration forms, as reproduced from time to time in the Congressional Record, reveals relatively little information on this particular point. Many of the organizations are, of course, too small to support any extensive program of publication. Occasionally, one notes that the registrant has prepared an article which was published in some journal or reproduced in pamphlet form for general distribution. It is, however, only in the case of the larger organizations that one finds mention of publications, and of a specific series of items of legislation favored or opposed. In conformity with our practice of relying upon the registration forms themselves to provide illustrative material, we present below a group of excerpts dealing with these particular points:

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### American Association of University Women:

Mentions its Journal, issued quarterly, and the general director's letter issued three or four times a year for educational guidance of branch officers. They list the following as being supported by the organization (July 26, 1948, p. 9549):

Federal aid to education	Stratton bill for displaced persons
Housing bill	World Health Organization
Repeal of oleomargarine tax	Appropriations
Marshall plan	Renewal of Reciprocal Trade Act
For Informational and Educational Exchange Act	Status-of-women bill

#### Oppose:

Equal-rights amendment  
Social-security appropriation bill

### American Farm Bureau Federation:

In accordance with the annual-meeting resolutions adopted by the AFBF, proposed legislation on the following matters has been supported or opposed (Fleming, Roger W., July 26, 1948, p. 9560):

Long-range agricultural program	Continuation of postwar construction of highways
Taxation	Transfer of USES from FSA to Labor Department
Agricultural appropriations	Transfer of Army Remount Service to USDA
Commodity Credit Corporation	Eradication of cattle grubs
Regulation of commodity exchanges	Amendment of Agricultural Marketing Act—and so on, through a list more than twice as long as this
Coordination of agricultural conservation services	
Fair Employment Practices Act	
Farm Credit	
Fertilizer	
European recovery program	

### American Legion:

Mr. Hayden lists the following publications (Hayden, Harry V., Jr., July 26, 1948, p. 9563):

The American Legion Magazine, New York City  
The National Legionnaire, Indianapolis  
National Legislative Bulletin, Washington, D. C.

Mr. Posten outlines a very broad program for which Legion stands, as follows: The American Legion and all veterans of World War I and World War II and their dependents on all matters affecting their care, their rehabilitation, hospitalization, reeducation and housing; all matters affecting the general welfare of our country with regard to national defense, Americanization, included in which is opposition to all subversive activities and particular attention to our immigration and naturalization laws; child welfare, not only for children of veterans but for all children; aid and assistance to veterans in agricultural development; matters dealing with our foreign policy and foreign relations, the development of sound civil-aviation programs and policies; the development of sound and progressive programs for the employment and reemployment of veterans in civilian pursuits and in civil service; legislation which would eliminate all improper discriminations and be of benefit to the men and women who are still in our armed services; and all other matters included in the mandates and program of the American Legion as adopted and approved by the national convention of the American Legion and/or by its national executive committee which are the ruling and policy-making bodies of the American Legion (Posten, Robert R., Jan. 29, 1948, p. 762).

### Canners League of Florida:

Made one trip to Washington to further the league's opposition to two pieces of pending legislation. Got material into the following papers:

Tampa Morning Tribune	Lakeland Ledger
Orlando Sentinel	West Volusia Journal
Palmetto News	Deland Sun News
Clearwater Sun	St. Augustine Record
St. Petersburg Times	Tallahassee Democrat
Florida Times-Union	Jacksonville Journal
Auburndale Journal	Bradenton Herald

At the end, he appends a note: Work on pending legislation is only incidental to principal activity as secretary-manager of organization (Hooks, Homer E., May 5, 1948, p. 5501).

**Millers' National Federation:**

\* \* \* I am not employed specifically to engage in activities described in section 307 of title 3, Public Law 601, Seventy-ninth Congress. During the preceding quarter, I devoted approximately 5 days to such activities which were incidental to my regular employment. \* \* \*

I am not employed to support or oppose any specific legislation. During the preceding quarter, I attended a hearing on a proposed amendment to the Federal Food, Drug, and Cosmetic Act, prepared a letter of information for an industry committee on pending labor legislation, and assisted an industry committee in preparing testimony in opposition to the proposed international wheat agreement (Fakler, Herman, July 26, 1948, p. 9659).

**National Association of Manufacturers:**

For:	Against:
Tax reduction	Economic controls legislation
Reduction in Government expenditures	Continuation of the Office of Technical Services
European recovery program	
National science foundation	

(NOTE.—It is my opinion that a small part of my time and expenses can be charged to duties requiring registration (Neal, William S., July 26, 1948, p. 9574).)

**National Fertilizer Association:**

**Publications of the association:**

Fertilizer News	Agronomic Notes
Fertilizer Review	Pasture Progress

I issued and distributed in the customary manner a press release relative to the association's report on fertilizer consumption in 1947 and one relative to the program of the association's annual convention of June 1948, but do not know what publishers may have published them in whole or in part (Lockwood, Maurice H., July 26, 1948, p. 9596). (Had similar report May 5, 1948.)

**Service Star Legion (July 26, 1948, p. 9549):**

**Service Star Legion Magazine.**

For:	Against:
Educational equalization support	OPA
Housing for veterans	Displaced persons
Marshall plan	
Public health	
Bureau of Child Welfare	
International relations	
School lunches	
Charter for Service Star Legion	

**United States Business Organizations, Inc.:**

Other than letters to members and mimeographed material sent to business organizations there is just one pamphlet, namely, "How Cooperatives Escape Income Taxes." Copy is attached (Dixon, Karl S., Jan. 29, 1948, p. 750).

**United States Savings and Loan League:**

Only the customary materials found in our trade papers, in our trade-association periodicals, and in our trade-association bulletins: FSLIC Premium Reduction—Now, by Morton Bodfish, Savings and Loan News, March 1948; FSLIC Premium Rate Reduction Still on Congress Agenda, by Morton Bodfish, April 1948, Directors Digest (condensed from Savings and Loan News, March 1948) (Bodfish, Morton, July 28, 1948, p. 9551).

## WITHDRAWAL AND DISCONTINUANCE OF REGISTRATION

No specific provision is made in the act for withdrawal and/or discontinuance of registration. In most cases this is probably a question largely theoretical in character, but it is conceivable that, in some instances, it might be important. On the basis of this possibility, the Secretary of the Senate has maintained a list of names of registrants who, it became known, were no longer subject to the terms of the law. By the end of September 1948, this list had grown to 82 names. In a few instances the registrant had died; in others, he gave notice of their change in employment status in connection with their registrations. Apparently, however, most registrants do not take the trouble to do either.

## CHAPTER V

### THE MERITS OF THE CASE

As one examines the record of the official registrations under the Lobby Registration Act, he gathers a number of rather distinct impressions. In the first place, all profess outwardly, at least, a desire to comply with the law. Many appear to be in doubt, for reasons already indicated, what the law is. Others comply not altogether willingly, a few reluctantly—but they do comply. And, almost without exception, they imply, if they do not say, that they do not engage in lobbying to any large extent, and anyway, that they do not do any harm. These many protestations of virtue and innocence begin to make one suspicious; against them, one begins to weigh what he knows about the way such groups operate, and what he has read in the press of their actions during the specific period covered by this report.

Then he begins to ponder over some of the fields in which lobbies have been or are now especially active—the tariff lobby; the natural resources lobby in its various forms; the real-estate group, battling against any kind of public housing program; the air-lines lobby; the agriculture lobby, and the dramatic struggle between the representatives of the dairy interests and the oleomargarine manufacturers. There are many more, but these will suffice for purposes of illustration. Spokesmen for all of these groups say they have never done a thing that was in any way improper, but newspapermen, trained to find out what the news is and to report it as they find it, tell quite a different story.

An evaluation of the evidence which a study of the operation of the lobby registration provisions of the Legislative Reorganization Act brings to light is not easy. At least, it is not easy in view of these conflicting claims to condense into two neat packages the arguments for and against the continuance of the present law, with or without amendments. That, from the point of view of the public interest, there is urgent need for some kind of supervision and control over some kinds of lobbying, there can be little doubt. Almost the entire contents of this report serve to emphasize the existence and the urgent character of that need.<sup>1</sup> The argument is more on the question of the nature of the remedial action to be taken than on the need for such action.

Even the definition of the problem raises difficulties. No one wishes either to prevent normal and proper communication between Members on the one hand, and individuals and organizations on the other, or to interfere with the useful work that many lobbyists perform in providing information to Members. Communication between citizens and Members of the legislature involves the exercise of basic

<sup>1</sup> Former Senator La Follette properly stresses the point that those lobbies which inform rather than coerce render a useful service; the congressional lobby, he says, "may be a pernicious evil or an indispensable part of the legislative process." See his article "Some Lobbies Are Good," in *New York Times Magazine*, May 16, 1948, pp. 15, 54ff.



constitutional rights, and is frequently beneficial to the public as well as helpful to Members. To an individual whose mental processes are not too complicated, the separation of the "good" from the "bad," the desirable from the undesirable, is a relatively simple matter. Those groups which favor things one believes in are good, and are rendering a significant public service; those which sponsor things of which one disapproves are thoroughly bad and are inimical to the welfare of the Nation. Since all people do not favor and oppose the same things, such a simple rule obviously provides little assistance toward a solution.

As is usual in such cases, opposition to the particular type of solution of the lobbying problem represented by the registration requirement arises from disagreement as to principle and as to policy. Some of the opposition is sincere while some of it comes from individuals or groups anxious to escape from such degree of regulation as the law provides. Those who dissent on principle claim that the measure constitutes an invasion of the long-established fundamental rights of the individual. One well-known writer goes so far as to claim that it is a violation of the constitutional guaranty of the rights of petition.<sup>2</sup>

After presenting a long list of defects and alleged defects in the act, he concludes:

The above points are not all the defects in the law. The statute is unequal in its application as between citizens, which of course casts doubt on constitutionality. Also the Supreme Court recently said it was unconstitutional for Texas to try by law to make a labor organizer register before exercising his rights of free speech or assembly. Why isn't it also unconstitutional for Congress by law to require, registration by a citizen before he is permitted to exercise his constitutional right of petition?

Among his other objections may be mentioned the vagueness of the wording of the law itself (discussed in an earlier chapter); its alleged invasion of the right freely to circulate printed materials; the severity of the penalties provided (loss of civil right to appear before committees of Congress for 3 years, in addition to fines or imprisonment); and the exemption of officials engaged in lobbying activities, possibly even on Government time and at Government expense.<sup>3</sup>

Those who dissent on grounds of policy maintain that the numerous State laws on the subject—there are 25 of them<sup>4</sup>—some of them of long standing, have never been able to control the lobbying situation in the State capitols, and that the new Federal law does not seem to be any more effective. If the press reports of lobbying activities in Washington during the Eightieth Congress are at all accurate, certainly there is much evidence in support of this view.

In connection with these newspaper accounts, it may be pointed out that this extraordinary activity on the part of the lobbyists was not an unnatural development. The Eightieth Congress, or any other Congress in this day and age, is confronted by a large number of important issues vitally affecting the daily lives and well-being of millions of businesses, trade associations, labor unions, farm organizations, professional associations, and individual citizens. As former Senator La Follette expressed it:

<sup>2</sup> Lawrence, David, in *Washington Evening Star*, December 6, 1948; this same view had been expressed by Senator McClellan in the debates in course of passage.

<sup>3</sup> In spite of statutory prohibitions, charges of lobbying on the part of officials in the executive branch are constantly heard: as recently as December 31, 1948, headlines proclaimed: "House Group Accuses Federal Agencies of Illegal Lobbying."

<sup>4</sup> See Zeller, Belle, *State Regulation of Lobbying*, in *Book of the States, 1948-49*, pp. 124-130, including table (Council of State Governments, Chicago, 1948).

Lobbying with respect to Federal legislation is a multimillion-dollar enterprise and seemingly increasing. Public housing, labor legislation, Government subsidies, public power development, universal military training, legislation pertaining to oil, railroads, and air lines—whatever the decisions may be by Congress on these and other pending issues, they will vitally affect the lives and fortunes of many.

The point is that, while great numbers of registrants under the act profess to be guiltless of any wrongful act or intent, many Members of the Congress and many trained observers, who make their living reporting the news as they find it, have a very different story to tell. These stories are significant, whether true or not. If true, remedial action of some kind would seem to be urgently necessary; if they are not true, then they tell what millions of people who read newspapers have been led to believe was true. It seems highly improbable, however, that so many observers, including many members of the working press, would all go wrong in their analysis of the activities of so many different groups.

During the recent Presidential campaign the charge was repeatedly made that lobbies thrived during the Eightieth Congress. President Truman charged in the course of the campaign that the Eightieth Congress acted on legislation only when it heard "its master's voice"—the voice of the biggest lobby in history, which, he said, spent money "like water" on Capitol Hill. But lobbies thrived in the past, and they may again in the future under other leadership in Congress, for the simple reason that the problem is not primarily a partisan one.

*Possible courses of action.*—The problem is, therefore, sufficiently general and sufficiently important to warrant some serious consideration of possible courses of action. Of these, three or four seem to be available:

1. Repeal the act.
2. Leave the act as it is.
3. Amend the act as soon as possible.
4. Conduct a thorough public investigation of the whole situation, prior to any further legislative action.

Many believe that, to adopt the first of these alternatives, i. e., repeal of the act, would be inadvisable, at least at this time. Although the measure in its present form has many admitted weaknesses, a trial period of 2 years is scarcely adequate to judge its merits and general effectiveness. Nor can it be said that there is any significant demand for repeal. Doubtless some organizations subject to its requirements would be glad to see it repealed, but the general sentiment seems rather to accept the act, with the hope that, by better administration and possible amendments, it may be made more effective.

The advisability of the second possibility—that of leaving the act as it is—is also open to question. Experience under the act, limited though it is, is still sufficient to indicate a number of weaknesses subject to correction by amendment, or, in some cases, by administrative determination. Some of these are listed below. Prof. Belle Zeller, author of the only study of the act previously available, strongly advocates the third possibility, i. e., thorough revision, going so far as to say that the lobbying title of the Legislative Reorganization Act should "be completely redrafted and its various sections considered as an integrated whole, in order to avoid contradictions and ambiguities."<sup>5</sup> The specific nature of some of the more important possibilities of change are shown in the accompanying table.

<sup>5</sup> Zeller, op. cit., p. 268.

A fourth alternative presumably contemplates leaving the act as it is, at least temporarily, pending the findings and recommendations of a full and thorough public investigation of the whole problem. No such investigation has been made for a number of years; the proposal is now being made by a number of persons in responsible positions, both in the legislative and executive branches of the Government. On December 1, 1948, it was reported in the New York Times and in other papers that President Truman had endorsed this proposal, believing that such an investigation would have "a very salutary effect."<sup>6</sup> Other mention of it has occurred since. Opposition to the idea arises on the ground that previous investigations have made available all essential information on the subject, and that such an inquiry might make a lot of newspaper headlines without producing any useful results in the form of improvements in the law and correct its weaknesses as a means of forestalling such an investigation.

As a concluding comment on lobbying in general, and the current situation with regard thereto in particular, we include an interesting comment by Fred Othman called *corridorists*:<sup>7</sup>

<sup>6</sup> Thomas L. Stokes very ably presents the arguments in favor of this proposal, in his syndicated column *A Look at the Lobbies*, appearing in the papers November 22, 1948:

"Every so often it's a good idea to explore the influence of big money on politics and see how it's done. For the sake of a healthy democracy, it's salutary to take the system apart and see how it ticks.

"Consequently, what is needed is an old-fashioned investigation of lobbyists and lobbying and the interests back of them such as we have not had around here for some time now. Lots of people are suggesting this, most recently the executive council of the International Association of Machinists. It adopted a resolution, at a meeting here, recommending a broad investigation by a joint congressional committee into all sorts of special-interest lobbies which, the council estimated, had spent \$12,000,000 and probably more to influence the last Congress.

"The last big-lobby investigation we had was that conducted by former Senator Hugo Black (D., Ala.), now Supreme Court Justice, into the utility lobby against the public-utility holding-company bill in 1935. The utilities, incidentally, would stand another careful scrutiny now, for they were very effective in the Eightieth Congress. Before that, in 1931, there was the Caraway Lobby Investigation Committee that devoted special attention to tariff lobbyists but went into other fields too.

"It would be very helpful to the President's program to keep such an investigation going continuously while that program was being presented to Congress. That was the technique of the now famous Truman committee which kept its eye constantly on the defense program during the war to ferret out inefficiencies, special favors, and corruption. Like that inquiry, the projected investigation would be a mirror held up constantly before Congress and the public."

<sup>7</sup> In Scripps-Howard papers, December 6, 1948:

"President Truman has his Attorney General investigating lobbyists. An ex-Congressman has pleaded not guilty to being a lobbyist. Congress is worrying about changing the lobbying law.

"In Washington as of this moment, there are exactly 1,240 registered lobbyists, including a Mr. Coleman representing the fertilizer interests, who is the latest on the list. How many unregistered lobbyists there are, nobody knows, but Mr. Truman would like to find out.

"A lobbyist is a fellow who hangs around the lobby of a legislature, grabbing Senators by their lapels and trying to get 'em to vote his way. There are no lobbies in the United States Capitol, but the lobbyists make the marble corridors do as well. They hate to be called lobbyists, perhaps because of the way they have been denounced by statesmen ever since this Republic was founded. Maybe they ought to be called *corridorists*.

"The lawgivers never have objected to lobbyists as such, but to lobbyists who hid behind whiskers and tried to act like somebody else. So, after 20 years of worrying about the problem, they passed a bill a couple of years ago forcing lobbyists to stand up and have their noses counted. The idea was to make 'em work out in the open. The 1,240 registered ones presumably do just that. Mr. Truman and his Attorney General aren't worrying so much about them as about the prosperous gents with the gold watch chains across their middles who lobby all over the place, but who insist they're lawyers, or press agents, or even research scientists. Machinations of some of these babies, according to gumshoes, are nefarious.

"Roger Slaughter, the one time Congressman from Missouri, was indicted the other day on charges of doing a lobbying job for the grain interests at a tremendous salary, without putting down his name on the dotted line, according to law. He denied he was a lobbyist at all and pleaded not guilty when his case came up in court.

"Sometimes lobbyists are out-and-out city slickers. One I remember most vividly represented the late Howard Hopson, the utilities magnate. The fat Hopson testified before a Senate committee his lobbyist earned \$25,000 a year, but was well worth it because he could produce the private home addresses of every lawmaker in Washington. All Hopson had to do, he said, was phone his man in Washington and bingo, he got the street number and phone listing of any Congressman he wanted. It was amazing, he said.

"The Senators were unimpressed. They called the lobbyist, a slick-haired young man in a sincere necktie. Was he able to perform these miracles? Certainly, he said. He'd paid \$1.25 for a copy of the Congressional Directory and whenever the boss wanted to get in touch with a legislator, he looked him up in the book. Parlaying one red-bound book into \$25,000 a year was an accomplishment I couldn't help admiring. Mr. Hopson had other ideas. He fired his lobbyist.

"Some lobbyists are hard-working, well-informed citizens who perform a genuine service in telling Congress exactly what their employers—whether labor leaders, farm chiefs, or businessmen—are thinking.

"And perhaps this is enough on an essay on lobbyists, except for one thing: President Truman may be interested to know that last year his own White House Police registered a lobbyist. They wanted to present some testimony before the Senate District Committee about a pension plan, and fearful about breaking the law they registered their witness. Now it turns out they didn't need to. Washington is a troublesome place, even for a conscientious cop."

TABLE VII.—*Specific proposals that have been made for amending the Lobby Registration Act of 1946*

1. *Clarification of terminology.*—Define or clarify terms that have in practice proved to be vague or ambiguous, such as "principal purpose" or "principally." In this case, the emphasis might perhaps be changed to apply to those organizations, an appreciable portion of whose activity is concerned with either securing the passage or the defeat of legislation. Professor Zeller suggests that the test might be a minimum expenditure of \$1,000.

2. *Clarify requirements relative to filing.*—Who is to file? The individual lobbyist, the employing organization, or both? What forms must be used, and under what circumstances? There are cases in which quarterly reports are being filed by organizations that are not actually registered. The whole situation is clouded with confusion.

3. *Centralize responsibility for administration.*—Professor Zeller suggests that the Attorney General's office should serve as the central filing office. Whatever the decision be with regard to that, it seems clear that responsibility should be vested in one office, serving both Houses of Congress, and thereby eliminating present duplication in filing requirements.

4. *Termination of registrations.*—Clarify in some manner the means of terminating registrations. At present, no procedure is available for this purpose, such terminations as do occur being largely the result of accident.

5. *Specify financial data required.*—Specify exactly what financial data are to be required of registrants. Some registrants now give data for their organizations, others for themselves as individuals. Some give their full salaries, while others report only such portion thereof as they believe applicable to their legislative work. Some report expenses for which they have been reimbursed in lump sums, while others itemize such expenditures in very great detail.

6. *Clarify coverage of the law.*—Is an attorney representing a client exempt from the application of the law, or must he register? Are there any other groups that should be specifically exempted, so that it may then be assumed that all others are included.

7. *Require organization membership data.*—It has been suggested by Professor Zeller that a statement of the bona fide total membership of organizations should be required.

8. *Explain method of determining policy.*—Professor Zeller also suggests that it would "be effective if each organization were required to state how its legislative policy is determined and to indicate the responsibility of the lobbyist in conveying these views on behalf of the membership of the organization."<sup>8</sup>

9. *Does act apply to individuals as well as organizations?*—Does the act apply to single individuals seeking to influence legislation, or only when they are employed by organizations? The act at present does not specify.

10. *Does act apply to legislative lobbying only?*—Does the law apply only to legislative lobbying, or was it intended to cover the efforts of lobbyists to influence administrative policies and determinations?<sup>9</sup>

<sup>8</sup> Zeller, Belle, *State Regulation of Lobbying*, in *Book of the States*, p. 269.

<sup>9</sup> See Herring, E. Pendleton, *Public Administration and the Public Interest* (McGraw-Hill, New York, 1936), and Leiserson, Avery, *Administrative Regulation: A Study of Representation of Interests* (University of Chicago Press, 1942). That this is a real problem is indicated in a note included in Jerry Klutts's column, *The Federal Diary* (Washington Post, August 4, 1948):

"The Maritime Commission is trying something new to discourage lobbyists and others who are looking for special favors. Hereafter, no one may call on any Maritime official or employee unless he first registers or publicly names the person, or persons, he wishes to visit. The Commissioners are excluded from this restriction.

"A visitors' office is being set up where callers will be sent to register. The system already is coming in for attack from people who do business with the agency."

# APPENDIX

## APPENDIX A

### THE REGULATION OF LOBBYING ACT

Being title III of the Legislative Reorganization Act of 1946 (Public Law 601, 79th Cong.; ch. 753, 2d sess.)

#### TITLE III—REGULATION OF LOBBYING ACT

- Sec. 301. Short title.
- Sec. 302. Definitions.
- Sec. 303. Detailed Accounts of Contributions.
- Sec. 304. Receipts for contributions.
- Sec. 305. Statements to be filed with Clerk of House.
- Sec. 306. Statement preserved for two years.
- Sec. 307. Persons to whom applicable.
- Sec. 308. Registration with Secretary of the Senate and Clerk of the House.
- Sec. 309. Reports and statements to be made under oath.
- Sec. 310. Penalties.
- Sec. 311. Exemption.

#### SHORT TITLE

SEC. 301. This title may be cited as the "Federal Regulation of Lobbying Act."

#### DEFINITIONS

SEC. 302. When used in this title—

- (a) The term "contribution" includes a gift, subscription, loan, advance, or deposit of money or anything of value and includes a contract, promise, or agreement, whether or not legally enforceable, to make a contribution.
- (b) The term "expenditure" includes a payment, distribution, loan, advance, deposit, or gift of money or anything of value, and includes a contract, promise, or agreement, whether or not legally enforceable, to make an expenditure.
- (c) The term "person" includes an individual, partnership, committee, association, corporation, and any other organization or group of persons.
- (d) The term "Clerk" means the Clerk of the House of Representatives of the United States.
- (e) The term "legislation" means bills, resolutions, amendments, nominations, and other matters pending or proposed in either House of Congress, and includes any other matter which may be the subject of action by either House.

#### DETAILED ACCOUNTS OF CONTRIBUTIONS

SEC. 303. (a) It shall be the duty of every person who shall in any manner solicit or receive a contribution to any organization or fund for the purposes hereinafter designated to keep a detailed and exact account of—

- (1) all contributions of any amount or of any value whatsoever;
  - (2) the name and address of every person making any such contribution of \$500 or more and the date thereof;
  - (3) all expenditures made by or on behalf of such organization or fund; and
  - (4) the name and address of every person to whom any such expenditure is made and the date thereof.
- (b) It shall be the duty of such person to obtain and keep a receipted bill, stating the particulars, for every expenditure of such funds exceeding \$10 in amount, and to preserve all receipted bills and accounts required to be kept by this section for a period of at least two years from the date of the filing of the statement containing such items.

RECEIPTS FOR CONTRIBUTIONS

SEC. 304. Every individual who receives a contribution of \$500 or more for any of the purposes hereinafter designated shall within five days after receipt thereof rendered to the person or organization for which such contribution was received a detailed account thereof, including the name and address of the person making such contribution and the date on which received.

STATEMENTS TO BE FILED WITH CLERK OF HOUSE

SEC. 305. (a) Every person receiving any contributions or expending any money for the purposes designated in subparagraph (a) or (b) of section 307 shall file with the Clerk between the first and tenth day of each calendar quarter, a statement containing complete as of the day next preceding the date of filing—

(1) the name and address of each person who has made a contribution of \$500 or more not mentioned in the preceding report; except that the first report filed pursuant to this title shall contain the name and address of each person who has made any contribution of \$500 or more to such person since the effective date of this title;

(2) the total sum of the contributions made to or for such person during the calendar year and not stated under paragraph (1);

(3) The total sum of all contributions made to or for such person during the calendar year;

(4) the name and address of each person to whom an expenditure in one or more items of the aggregate amount or value, within the calendar year, of \$10 or more has been made by or on behalf of such person, and the amount, date, and purpose of such expenditure;

(5) the total sum of all expenditures made by or on behalf of such person during the calendar year and not stated under paragraph (4);

(6) the total sum of expenditures made by or on behalf of such person during the calendar year.

(b) The statements required to be filed by subsection (a) shall be cumulative during the calendar year to which they relate, but where there has been no change in an item reported in a previous statement only the amount need be carried forward.

STATEMENT PRESERVED FOR TWO YEARS

SEC. 306. A statement required by this title to be filed with the Clerk—

(a) shall be deemed properly filed when deposited in an established post office within the prescribed time, duly stamped, registered, and directed to the Clerk of the House of Representatives of the United States, Washington, District of Columbia, but in the event it is not received, a duplicate of such statement shall be promptly filed upon notice by the Clerk of its nonreceipt;

(b) shall be preserved by the Clerk for a period of two years from the date of filing, shall constitute part of the public records of his office, and shall be open to public inspection.

PERSONS TO WHOM APPLICABLE

SEC. 307. The provisions of this title shall apply to any person (except a political committee as defined in the Federal Corrupt Practices Act, and duly organized State or local committees of a political party), who by himself, or through any agent or employee or other persons in any manner whatsoever, directly or indirectly, solicits, collects, or receives money or any other thing of value to be used principally to aid, or the principal purpose of which person is to aid, in the accomplishment of any of the following purposes:

(a) The passage or defeat of any legislation by the Congress of the United States.

(b) To influence, directly or indirectly, the passage or defeat of any legislation by the Congress of the United States.

REGISTRATION WITH SECRETARY OF THE SENATE AND CLERK OF THE HOUSE

SEC. 308. (a) Any person who shall engage himself for pay or for any consideration for the purpose of attempting to influence the passage or defeat of any legislation by the Congress of the United States shall, before doing anything in furtherance of such object, register with the Clerk of the House of Representatives and the Secretary of the Senate and shall give to those officers in writing and under

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oath, his name and business address, the name and address of the person by whom he is employed, and in whose interest he appears or works, the duration of such employment, how much he is paid and is to receive, by whom he is paid or is to be paid, how much he is to be paid for expenses, and what expenses are to be included. Each such person so registering shall, between the first and tenth day of each calendar quarter, so long as his activity continues, file with the Clerk and Secretary a detailed report under oath of all money received and expended by him during the preceding calendar quarter in carrying on his work; to whom paid; for what purposes; and the names of any papers, periodicals, magazines, or other publications in which he has caused to be published any articles or editorials, and the proposed legislation he is employed to support or oppose. The provisions of this section shall not apply to any person who merely appears before a committee of the Congress of the United States in support or opposition to legislation; nor to any public official acting in his official capacity; nor in the case of any newspaper or other regularly published periodical (including any individual who owns, publishes, or is employed by any such newspaper or periodical) which in the ordinary course of business publishes news items, editorials, or other comments, or paid advertisements, which directly or indirectly urge the passage or defeat of legislation, if such newspaper, periodical, or individual, engages in no further or other activities in connection with the passage or defeat of such legislation, other than to appear before a committee of the Congress of the United States in support of or in opposition to such legislation.

(b) All information required to be filed under the provisions of this section with the Clerk of the House of Representatives and the Secretary of the Senate shall be compiled by said Clerk and Secretary, acting jointly, as soon as practicable after the close of the calendar quarter with respect to which such information is filed and shall be printed in the Congressional Record.

### REPORTS AND STATEMENTS TO BE MADE UNDER OATH

SEC. 309. All reports and statements required under this title shall be made under oath, before an officer authorized by law to administer oaths.

### PENALTIES

SEC. 310. (a) Any person who violates any of the provisions of this title, shall, upon conviction, be guilty of a misdemeanor, and shall be punished by a fine of not more than \$5,000 or imprisonment for not more than twelve months, or by both such fine and imprisonment.

(b) In addition to the penalties provided for in subsection (a), any person convicted of the misdemeanor specified therein is prohibited, for a period of three years from the date of such conviction, from attempting to influence, directly or indirectly, the passage or defeat of any proposed legislation, or from appearing before a committee of the Congress in support of or opposition to proposed legislation; and any person who violates any provision of this subsection shall, upon conviction thereof, be guilty of a felony, and shall be punished by a fine of not more than \$10,000, or imprisonment for not more than five years, or by both such fine and imprisonment.

### EXEMPTION

SEC. 311. The provisions of this title shall not apply to practices or activities regulated by the Federal Corrupt Practices Act nor be construed as repealing any portion of said Federal Corrupt Practices Act. -

## APPENDIX B

### FORMS USED FOR PURPOSES OF REGISTRATION UNDER THE REGULATION OF LOBBYING ACT<sup>1</sup>

Form A. Detailed statement to be filed, in duplicate, with the Clerk of the House of Representatives under the Lobbying Act.

Form B. Registration, in duplicate, with the Clerk of the House of Representatives under the Lobbying Act.

Form C. Quarterly report of person registering under Lobbying Act to be filed, in duplicate, with the Clerk of the House of Representatives.

<sup>1</sup> Identical forms are available for filing with the Secretary of the Senate.

APPENDIX C

CLASSIFICATION OF ORGANIZATIONS BY TYPE, SHOWING THOSE REGISTERED DURING THE EIGHTIETH CONGRESS AND PRESENTING SELECTED LISTS IN FULL

(Those lists which are reproduced here for illustrative purposes are shown in capital letters. The others can be made available to the committee if desired. These presented here relate either to fields of permanent interest or to fields in which lobbying activities were especially conspicuous during the 80th Cong.)

- |  |  |
|--|--|
| 1. AGRICULTURE                             | 17. Professional                           |
| 2. BUSINESS—GENERAL                        | 18. REAL ESTATE: BUILDING AND CONSTRUCTION |
| 3. Civic organizations—civic and political | 19. Religious                              |
| 4. Citizen organizations—economic          | 20. Tax groups                             |
| 5. Education                               | 21. Textiles and apparel                   |
| 6. Financial                               | 22. Trade groups—miscellaneous             |
| 7. Foods and beverages                     | 23. Transportation:                        |
| 8. Health                                  | Air  |
| 9. INTERNATIONAL                           | Highway                                    |
| 10. Labor—Government                       | Rail                                       |
| 11. LABOR—PRIVATE                          | Water                                      |
| 12. Lumber and forest products             | 24. VETERANS AND MILITARY                  |
| 13. Official                               | 25. Welfare                                |
| 14. Oil, gas, and metal products           | 26. Women's organizations                  |
| 15. Power and communications               | 27. Individuals                            |
| 16. Printing and publishing                |  |

ILLUSTRATIVE GROUPS

- |                     |  |
|---------------------|--|
| 1. Agriculture      | 5. Real estate—Building and construction |
| 2. Business—general | 6. Veterans and military                 |
| 3. International    |  |
| 4. Labor—private    |  |

AGRICULTURE

	Registered		Number of employees	Salary range and notes
	1947	1948		
Agricultural Insecticide and Fungicide Association	X	-----	1	Not specified—\$33 per diem.
Agricultural Labor Bureau of the San Joaquin Valley, Inc.	X	-----	1	Not specified.
Agricultural Producers Labor Committee	X	-----	1	Do.
American Association of Nurserymen, Inc.	X	X	1	\$10,000—only 10 percent for legislative work.
American Farm Bureau Federation, Edward A. O'Neal, president:				
House Judiciary, Feb. 7, 1947 (statement)	X	X	6	\$15,000—\$5,000.
House Judiciary, June 15, 1947				
American Iris Society	X	X	1	\$10,400.
American National Livestock Association, F. E. Mollin, executive secretary: House Judiciary, Jan. 30, 1948.	X	X	1	\$36,000
American Plant Food Council, Inc., Hon. Fritz Lanham, executive secretary: House Judiciary, Feb. 18, 1948 (statement).	X	X	1	Not specified; law firm, on fee basis.
California Almond Growers Exchange	X	X	1	Do.
California Deciduous Council	X	X	1	Do.
California Fruit Growers Exchange	X	X	1	Do.
California Walnut Growers Exchange	X	X	1	Do.
Dairy Industry Committee	X	X	1	\$3,000 salary as executive secretary.
Farmers Educational and Cooperative Union of America	-----	X	1	\$3,800.
Forest Farmers Association Cooperative (Georgia)	X	X	1	\$5,160.
Grain and Feed Dealers National Association, Elton Kile, chairman: House Judiciary, Feb. 5, 1947.	-----	-----	-----	-----
Hawaiian Sugar Planters' Association	-----	X	1	Not specified.
Hemp Producers Association	X	-----	1	\$2,000.
Holland Bulb Exporters Association, Inc.	X	-----	1	\$100 monthly retainer for law firm.



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## AGRICULTURE—Continued

	Registered		Number of employees	Salary range and notes
	1947	1948		
Holland Plant Exporters Association.....	X		1	\$1,000 retainer.
Holstein-Friesian Association of America.....	X	X	6	Law firm—\$5,000 to one who appears.
International Association of Ice Cream Manufacturers.....				
Joint Livestock Committee.....	X		1	\$8,000.
Mountain States Beet Growers Market Association.....	X		1	\$2,600.
National Agricultural Limestone Association.....	X	X	1	\$2,000.
National Association of Insecticide and Disinfectant Manufacturers, Inc.....				
National Association of Plant Patent Owners.....				
National Board of Fur Farm Organizations.....	X	X	1	\$12,000 and expenses.
National Cooperative Council.....				
National Cooperative Milk Producers Federation, House Judiciary, statement submitted, Feb. 10, 1947:				
Charles W. Holman, secretary, House Judiciary, Mar. 26, 1947 (statement).....				
John A. Haas, counsel, House Judiciary Jan. 30, 1948.....	X	X	7	\$12,500—\$6,000.
National Council of Farmer Cooperatives, William Heckendorn, assistant secretary: House Judiciary, Feb. 16, 1948.....	X	X	7	\$11,000, \$7,500, and \$7,500.
National Council to Aid Agricultural Workers.....				
National Dairy Union.....				
National Farm Committee.....				
National Farmers Union, Russell Smith, legislative secretary:				
Senate Judiciary, Jan. 13, 1948.....				
House Judiciary, Mar. 10 and 12, 1948 (statement).....	X	X	2	\$8,400—\$5,000.
Senate Judiciary, Mar. 13, 1948 (statement) legislative committee.....				
National Fertilizer Association.....	X	X	4	\$8,400.
National Grange, J. T. Sanders, legislative counsel: Senate Judiciary, Mar. 17 and 18, 1948.....				
House Judiciary, Feb. 16, 1948.....	X	X	2	\$7,000—\$4,200, latter part time.
National Institute of Farm Opinion.....				
National Institute of Oil Seed Products.....				
National Lime Association.....				
National Retail Farm Equipment Association, W. R. Noble, Washington manager: House Judiciary, Feb. 4, 1947.....	X	X	1	\$4,500.
National Soybean Processor Association.....				
Northwest Horticultural Council.....		X	1	Not specified; client-attorney relationship.
Northwest Nut Growers.....	X	X	1	Not specified; law firm.
Oregon Nut Growers.....	X		1	Do.
Oregon State Farmers Association.....	X		1	Not specified.
Texas and Southwestern Cattle Raisers' Association.....	X		1	\$8,000.
Texsun Citrus Exchange.....		X	1	Not specified; law firm.
Western Beet Growers Association.....	X	X	1	\$30 per diem.
Western Growers Association.....	X	X	1	Not specified.

## BUSINESS—GENERAL

American Association of Small Business, Inc., Joseph D. Henderson, managing director: House Judiciary, Mar. 10, 1947 (statement).....	X	X	1	\$6,000.
American Business Association, Inc.....				
American Business Congress.....				
American Chamber of Commerce (Mexico City).....	X	X	1	\$14,000—includes \$4,000 retainer fee.
American Fair Trade Council.....	X	X	1	\$4,000.
American Foreign Traders.....				
American Greek Chamber of Commerce.....				
American Manufacturers Association.....		X	1	Not specified; only part time on legislative work.
American Products Council.....				
American Retail Federation.....	X	X	3	\$1,600—\$800; part-time work.
Associated Industries of Kentucky, Robert T. Caldwell, general counsel: Senate Judiciary, Jan. 20 and 21, 1947.....				
California State Chamber of Commerce.....	X	X	1	\$6,900.

## BUSINESS—GENERAL—Continued

	Registered		Number of employees	Salary range and notes
	1947	1948		
Chamber of Commerce of the United States: Thomas W. Howard, manager: Senate Judiciary, Jan. 17, 1947.				
Milton A. Smith, assistant general counsel: House Judiciary, Feb. 3, 1947.				
House Judiciary, statement submitted Apr. 21, 1947.	X	X	3	\$15,000—\$10,000; first on fourth time.
David J. Guy: Senate Judiciary, Mar. 8, 1948 (statement).				
Milton A. Smith, assistant general counsel: House Judiciary, Jan. 30, 1948.				
Chicago Board of Trade, I. M. Herndon, manager, transportation department: House Judiciary, Jan. 29, 1948.				
Chinese Merchants Benevolent Association of Honolulu.		X	1	\$7,700, which includes expenses.
Cincinnati Chamber of Commerce, R. A. Ellison, manager: House Judiciary, Jan. 30, 1948.				
Cleveland Chamber of Commerce.	X		3	\$8,400—\$4,800; not full-time work.
Colorado Associated Businessmen, Inc.		X	1	Not specified.
Commerce and Industry Association of New York, House Judiciary, statement submitted, Mar. 26, 1947:				
Thomas J. Miley, secretary: House Judiciary, Jan. 26, 1948.				
House Judiciary, Jan. 28, 1948.				
Conference of Small Business Organizations.	X	X	1	\$12,000.
Council of American Industry.				
Dallas Chamber of Commerce (Texas).	X	X	1	\$6,000.
East Texas Chamber of Commerce.		X	1	\$8,250.
Examerica Traders of New York, Inc.		X	1	\$3,500, only part for legislative work.
Forks Chamber of Commerce (Washington).		X	1	With others, \$10,000 and expenses.
Galveston Chamber of Commerce (Texas), F. G. Robinson, traffic manager: House Judiciary, Feb. 16, 1948.				
Idaho Chamber of Commerce: Senate Judiciary, statement submitted, Feb. 28, 1948.				
Illinois Associated Businessmen, Inc.	X	X	1	No salary.
Illinois Manufacturers Association, David R. Clarke, counsel: House Judiciary, Feb. 10, 1947.		X	1	Not specified.
Independent Business Council of America, Inc.		X	2	No salary.
Indiana Chamber of Commerce, Herschel A. Holloper, traffic directory House Judiciary, July 9, 1947.				
Institute of American Trade.				
Inter-American Council of Commerce and Production.				
International Chamber of Commerce.				
International Trade Association, Inc.				
Iowa Small Businessmen's Committee.	X		1	\$200 retainer.
Kansas Independent Businessmen's Association.	X	X	2	\$200 retainer; 1, no salary.
Long Beach Chamber of Commerce (California).	X		1	Not specified.
Manufacturers Association of Connecticut, Frederick H. Waterhouse, counsel: Senate Judiciary, Jan. 21, 1947 (statement).				
Merchants and Manufacturers Association.				
Michigan Associated Businessmen, Inc.		X	1	Do.
Minnesota Associated Businessmen, Inc.		X	3	Expenses only.
Minnesota Small Business, Inc.	X		1	\$1,800.
Mississippi Associated Businessmen, Inc.		X	1	No salary; some hoped for in future.
Mississippi Independent Business Association, Inc.	X		1	No salary.
Missouri-Kansas Businessmen's Association, Inc.		X	1	Expenses only.
Montana State Chamber of Commerce.	X		1	\$7,200.
National Associated Businessmen, Inc.		X	1	Not over \$1,000 per annum for legislative work.
National Association of Manufacturers, Raymond S. Smethurst, counsel:				
Senate Judiciary, Jan. 16, 1947 (statement).				
House Judiciary, Feb. 10, 1947.	X	X	6	\$25,000—\$7,500.
National Business Bureau.				
National Federation of Small Business, Inc., Willis J. Ballinger, economic adviser: House Judiciary, Mar. 21, 1947 (statement).	X		5	\$5,000—\$3,000; the first on half time.
National Industrial Council.				

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## BUSINESS—GENERAL—Continued

	Registered		Number of employees	Salary range and notes
	1947	1948		
National Industrial Traffic League.....				
National Institute of Manufacturers and Distributors.....				
National Patent Council.....	X		1	\$14,000.
National Small Businessmen's Association, Arthur W. Kimball: Senate Judiciary, Jan. 21, 1947 (statement).....	X	X	2	\$7,500-\$7,200.
New York Associated Businessmen, Inc.....		X	1	Expenses only.
North Carolina Merchants Association.....	X		1	\$7,500.
Ohio State Chamber of Commerce.....	X	X	2	\$6,250-\$5,600.
Oklahoma State Chamber of Commerce.....		X	1	None.
Port Angeles Chamber of Commerce (Washington).....		X	1	With others, \$10,000 and expenses.
Port Townsend Chamber of Commerce (Washington).....		X	1	Do.
Proprietary Association of America, James F. Hoge, general counsel: House Judiciary, Feb. 16, 1948.				
Retailers National Council.....				
Sequoia Chamber of Commerce (Washington).....		X	1	Do.
Small Business Association of New Jersey.....	X	X	1	Not specified.
Smaller Business Association of New England, Inc.....	X		1	\$5,200.
Southern States Industrial Council.....	X	X	4	\$7,500-\$1,800.
Tool Owners Union, Inc.....	X	X	1	Not specified, plus expenses.
Trade Mark Records Bureau.....				
Trade Research Council.....				
United Indian Traders Association, Inc.....		X	1	\$10,000, plus expenses.
United States Associates, International Chamber of Commerce.....				
United States Business Organizations, Inc.....	X	X	3	\$12,000-\$1,000.
United States Junior Chamber of Commerce.....				
Washington Board of Trade.....	X	X	1	\$10,000.
Wisconsin Associated Businessmen, Inc.....		X	1	Not specified.
Wisconsin State Chamber of Commerce.....	X	X	2	\$10,000—not specified.

## INTERNATIONAL

American Association for the United Nations, Inc.....				
American Christian Palestine Association.....				
American Committee for the Protection and Salvage of Articles and Historical Monuments in Europe.....				
American Committee for the Protection of the Foreign Born.....	X	X	2	Not indicated.
American Council of Pacific Relations.....				
American Free World Association.....				
American Friends of Italian Aid, Inc.....				
American-Hungarian Federation, Inc.....				
American Institute of Cooperation.....				
American Italian Relief.....				
American Jewish Committee.....		X	1	Not determined; seeking modification of Trading With the Enemy Act.
American Jewish Conference.....				
American League for a Free Palestine.....				
American League for an Undivided Ireland.....		X	1	\$3,000.
American Peace Society.....				
American Relief for France.....				
American Relief for Italy, Inc.....				
American Zionist Emergency Council.....				
Americans United for World Government, Inc.....	X	X	4	\$5,200-\$2,244.
Catholic Association for International Peace.....				
Central European Research Foundation.....	X		1	\$1.
Chinese Merchants Benevolent Association of Honolulu.....		X	1	\$7,700.
Citizens Committee for Displaced Persons, Earl G. Harrison, chairman: House Judiciary, July 18, 1947 (statement).....	X	X	30	\$18,000-\$3,000.
Citizens Committee for Reciprocal World Trade.....		X	1	\$21,000 to June 15, 1948, plus expenses.
Committee for International Educational Reconstruction.....				
Committee for Equality in Naturalization.....	X		1	\$1,000 per month, up to 6 months.
Committee for the Marshall Plan To Aid European Recovery.....	X	X	7	\$10,000-\$6,000.
Committee for World Travel.....		X	2	Not indicated.
Committee To Study the Organization of Peace.....				

# ADMINISTRATION OF THE LOBBY REGISTRATION PROVISION 49

## INTERNATIONAL—Continued

	Registered		Number of employees	Salary range and notes
	1947	1948		
Federal Union, Inc.				
Foreign Affairs Research Council		X	2	\$3,100.
India Welfare League, Inc., Dr. Mubarek Ali Kahn, national president: House Judiciary, Apr. 25, 1947.				
Indonesia League of America, Inc.: House Judiciary, statement submitted, May 2, 1947.				
Institute for Central European Research	X		1	\$1.
Institute of Chinese Culture				
Institute of Inter-American Affairs				
Institute of Inter-American Amity and Trade Pan Amigos.				
Institute of Inter-American Education				
Institute of Pacific Relations				
Institute of World Policy				
Inter American Development Commission				
International Geneva Association				
Jacob, Betty M. (Philadelphia)		X	1	None; working on European relief.
Korean Immigration and Naturalization Committee, Walter J. Lung: House Judiciary, Apr. 21, 1948.	X		1	\$4,000.
National Committee for India's Freedom				
National Committee for the Marshall Plan		X	1	\$125 per week, plus actual expenses.
National Council Against Conscription	X		1	Actual expenses.
National Council for the Prevention of War	X	X	4	\$5,400-\$2,500.
Natural Resources Commission of China		X	1	\$7,500; total expenditures, \$30,000.
Pan-American Highway Confederation				
Pan-American Student Chain				
Pan-American Union				
Pirnie, Loesand Company, Federal, Inc.		X	1	At present rate of exchange, about 10 cents yearly.
Southern California Committee on Displaced Persons.		X	1	\$460 per month, plus actual expenses.
United Nations Citizenship League (Baltimore), Virginia Starr Freedom: House Judiciary, Mar. 10 and 12, 1947.				
United Nations of Earth Association				
United Nations Rehabilitation and Relief Administration, Marvin Klemme, former official: House Judiciary, July 2, 1947.				
Statement, July 2, 1947				
Union Now Association				
War Resisters League	X		1	\$1,725.

## LABOR—PRIVATE

Air Line Pilots Association, AFL	X	X	2	Both \$7,000.
Amalgamated Association of Street Electric Railway and Motor Coach Employees of America.				
Amalgamated Clothing Workers of America, CIO, John Abt, special counsel: Senate Judiciary, Jan. 17, 1947 (statement).	X	X	1	\$4,420.
Amalgamated Lithographers of America				
Amalgamated Meat Cutters and Butcher Workmen of America.				
American Communications Association, CIO	X	X	1	\$2,236.
American Federation of Labor:				
Walter J. Mason, national legislative representative:				
Senate Judiciary, Jan. 17, 1947 (statement).				
House Judiciary, Feb. 5, 1947				
Senate Judiciary, Mar. 13, 1948				
House Judiciary, May 2, 1948 (statement)				
William Green, president: House Judiciary, June 13, 1947.				
Lewis G. Hines, national legislative representative:	X	X	4	3 at \$3,280.
Senate Judiciary, Jan. 13, 1948				
House Judiciary, Jan. 28, 1948				
Salma Borchardt, representative:				
House Judiciary, Mar. 10 and 12, 1948 (statement).				
House Judiciary, Mar. 10 and 12, 1948 (supplementary statement).				

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## LABOR—PRIVATE—Continued

	Registered		Num- ber of em- ployees	Salary range and notes
	1947	1948		
American Train Dispatchers Association.....	X	X	2	\$6,000; other \$1,000 monthly retainer from 7 labor organizations.
American Shipmasters' Association, Capt. Donald Preble: House Judiciary, Mar. 15, 1948.				
America's Wage Earners Protective Conference, AFL.	X	X	2	\$12,000-\$5,200.
Association of Communication Equipment Workers.				
Bakery and Confectionery Workers International Union of America, AFL.	X	X	1	\$5,616.
Barbers Union, Local 239, AFL.	X		1	No salary.
Brotherhood of Locomotive Engineers.	X	X	2	\$10,727; other \$1,000 monthly retainer from 7 labor organizations.
Brotherhood of Locomotive Firemen and Enginemen:				
Jonas A. McBride, vice president: House Judiciary, Apr. 14, 1947.	X	X	6	{ 2 at \$7,000; 2 at \$10 per diem; others not specified
John T. Corbett, national legislative representative: Senate Judiciary, Jan. 13, 1948.				
Brotherhood of Maintenance of Way Employees, AFL.	X	X	4	\$8,600; 2 at \$4,050; not specified.
Brotherhood of Railroad Signalmen of America, AFL.	X	X	3	\$5,250-\$4,380.
Brotherhood of Railroad Trainmen:				
Warren H. Atherton, Esq.:	X	X	12	\$14,800-\$14.75 per diem.
House Judiciary, Apr. 14, 1947.				
House Judiciary, resumed, Apr. 18, 1947.				
Senate Judiciary, Jan. 13, 1948.				
Harry See, national legislative representative:	X	X	2	\$8,000 plus \$12 per diem for expenses; not specified.
House Judiciary, Apr. 14, 1947.				
Senate Judiciary, Jan. 8, 1948.				
House Judiciary, Jan. 30, 1948.	X	X	2	\$8,000 plus \$12 per diem for expenses; not specified.
Brotherhood of Railway Carmen of America, AFL.	X	X	2	\$8,000 plus \$12 per diem for expenses; not specified.
Brotherhood of Railway and Steamship Clerks, Freight Handlers, Express, and Station Employees, AFL, Hartman Barber, general representative:				
House Judiciary, Jan. 30, 1948.	X	X	3	2 at \$4,836; \$15 per diem.
House Judiciary, Mar. 10 and 12, 1948 (statement).				
Canal Zone Central Labor Union, Balboa.	X	X	1	\$3,744.
Commercial Telegraphers Union.	X		1	\$1,000 monthly retainer from 7 labor organizations.
Committee of Alaska Railroad Labor Organizations.	X		2	\$13,000.
Communications Workers of America.		X	2	\$13,000.
Congress of Industrial Organizations:				
Lee Pressman, general counsel:				
Senate Judiciary, Jan. 18, 1947.	X	X	2	\$4,420; other not specified.
House Judiciary, Feb. 5, 1947.				
Seth Levine, research consultant: House Judiciary, Mar. 19, 1947.				
Phillip Murray, president: House Judiciary, July 9, 1947 (statement).				
George Weaver, civil rights division: Senate Judiciary, Mar. 13, 1948.				
Depot Employees Development Association.		X	1	\$17 per diem and expenses.
Employees Committee for Low Cost Retirement Benefits.	X	X	4	Each at \$300 per month.
Farm Labor Association of Northern Ohio.		X	1	\$150 per month as secretary-treasurer.
Federation of Architects, Engineers, Chemists, and Technicians.				
Food, Tobacco, Agriculture, and Allied Workers of America, Elizabeth Sasuly, Washington representative:				
House Judiciary, Feb. 5, 1947.	X	X	1	\$3,600.
House Judiciary, Mar. 10 and 12, 1948.				
Foremen's Association of America.	X		19	\$7,500-\$3,420.
Foremen's League for Education and Association.	X		2	\$21,000; \$5,000 retainer plus \$1,000 monthly.
Former employees of Northwest Airlines, 2,500 individuals.	X		1	Contingent basis.
Garment Center Truck Drivers Association, Inc., Emil S. Neufeld, executive secretary: House Judiciary, Feb. 7, 1947.				

# ADMINISTRATION OF THE LOBBY REGISTRATION PROVISION 51

## LABOR—PRIVATE—Continued

	Registered		Number of employees	Salary range and notes
	1947	1948		
Hotel and Restaurant Employees and Bartenders Union, AFL.	X	X	1	\$7,200.
Industrial Union of Marine and Shipbuilding Workers, CIO, Walter H. Oakes, regional director: Senate Judiciary, Jan. 18, 1947.				
International Allied Printing Trades Association	X		1	\$3,400.
International Association of Asbestos Workers				
International Association of Boilermakers, Iron Shipbuilders, and Helpers of America.				
International Association of Machinists	X	X	14	\$8,000-\$4,000.
International Association of Marble Polishers and Helpers.				
International Association of Bookbinders		X	1	None agreed upon.
International Brotherhood of Electrical Workers, AFL.	X	X	1	\$4,680.
International Brotherhood of Firemen and Oilers		X	1	\$3,600.
International Brotherhood of Pulp, Sulphite and Paper Mill Workers.				
International Brotherhood of Teamsters, Chauffeurs and Helpers Union, AFL.	X		1	\$12,000.
International Federation of Technical Engineers, Architects, and Draftsmen, AFL.	X	X	2	Both \$7,200.
International Federation of Telephone Workers				
International Foundation for Lathing and Plastering.				
International Hod Carriers, Building and Common Laborers Union of America.				
International Ladies Garment Workers Union, Pauline Newman, representative: House Judiciary, Mar. 10 and 12, 1948.				
International Longshoremen's and Warehousemen's Union.	X	X	2	\$4,160: \$1,456 as one-third of salary for legislative work.
International Maritime Union of America, Louis R. Harolds, general counsel: House Judiciary, Mar. 10, 1948.				
International Negro Domestic Workers Union, Inc.				
International Printing Pressmen and Assistants Union of North America.				
International Typographical Union, AFL: House Judiciary, statement submitted, May 5, 1947.	X		3	\$5,590-\$5,564; \$18.20 per diem.
International Union of Mine, Mill, and Smelter Workers, CIO.	X	X	2	\$3,900-\$3,180.
International Union of Operating Engineers				
International Union, United Automobile, Aircraft and Agricultural Implement Workers of America, UAW-CIO.		X	2	\$100 per week, plus expenses; \$9 per diem, plus expenses.
International Union of United Brewery, Flour, Cereal, Soft Drinks, and Distillery Workers of America, CIO.		X	1	Not specified.
International Woodworkers of America, CIO.	X		1	\$6,000.
Junior Order of United American Mechanics: C. E. Babcock, chairman, legislative committee:				
House Judiciary, Apr. 25, 1947.				
House Judiciary, June 13, 1947.	X	X	1	Expenses only.
House Judiciary, statement submitted, June 27, 1947.				
House Judiciary, June 27, 1947.				
Maritime Committee, CIO:				
Hoyt S. Haddock, executive secretary:				
House Judiciary, Mar. 15, 1948.				
House Judiciary, Apr. 28, 1947.	X	X	2	\$546 as one-tenth of salary \$200 as minor part of salary for legislative work.
House Judiciary, May 5, 1947 (statement).				
Soth Levine: House Judiciary, Apr. 28, 1947.				
Master Mariners' Guild, Capt. Donald Preble: House Judiciary, Mar. 15, 1948 (statement).				
Mine, Mill and Smelter Workers Union, Crystal City, Mo., Leonard Douglas: Senate Judiciary, Jan. 18, 1947 (statement).				
National AHEPA, National Committee on Immigration:				
Leo E. Ypsilanti, chairman: House Judiciary, Apr. 21, 1947.				
Sorterios Nicholson, executive vice chairman: House Judiciary, Apr. 21, 1947.				
National Association of Motor Operators		X	1	Annual retainer for legal services.
National Association of Stevedores.		X	1	Expenses only.
National Federation of Telephone Workers	X		4	\$12,000, \$9,000, 2 at \$7,200.
National Foremen's Institute, Inc.				

# 52 ADMINISTRATION OF THE LOBBY REGISTRATION PROVISION

## LABOR—PRIVATE—Continued

	Registered		Number of employees	Salary range and note
	1947	1948		
National Organization of Masters, Mates and Pilots of America, AFL, Capt. William C. Ash, vice president: House Judiciary, Apr. 28, 1947 (statement).	X	-----	1	\$4,200.
National Railroad Pension Forum, Inc.-----	X	X	1	No fixed amount; expenses paid.
National Union of Marine Cooks and Stewards, CIO.-----	-----	X	1	\$100 per month for expenses.
Oil Workers International Union, CIO.-----	X	X	1	\$3,900.
Operative Plasterers and Cement Finishers, International Association, AFL.-----	X	-----	1	\$7,120, plus \$70 per week expenses.
Order of Railroad Telegraphers, AFL.-----	X	X	4	\$4,800; 2 at \$4,380; 1 retainer.
Order of Railway Conductors of America, W. D. Johnson, vice president and national representative:				
House Judiciary, Apr. 14, 1947.-----	X	X	3	(\$8,500; \$12 per diem; \$1 monthly retainer for labor organizations.
House Judiciary, Jan. 30, 1948.-----				
Panama Railroad Employees Association.-----	-----	X	1	No salary; expenses paid.
Plate Printers, Die Stampers and Engravers Union, D. C. Locals, AFL.-----	X	-----	1	\$6,000.
Railroad Employees National Pension Association, Inc.-----	-----	X	1	\$450 per month.
Railway Employees Department, AFL.-----	X	X	1	\$6,000.
Railway Labor Executives Association, A. E. Lyon, executive secretary: House Judiciary, Jan. 30, 1948.-----	-----	X	1	\$8,500.
Railway Mail Association, AFL.-----	X	-----	1	\$5,750.
Retail, Wholesale and Department Store Union, CIO.-----	-----	X	1	\$8,500.
Seafarers International Union of North America, Joseph H. Volplan, welfare chairman: House Judiciary, May 2, 1947.-----	-----	X	1	\$5,750.
Sheet Metal Workers International Association, AFL.-----	X	X	1	\$9,000.
Society of Marine Inspectors.-----	X	-----	1	\$3,600.
Switchmen's Union of North America, AFL.-----	X	-----	1	\$7,404.
Textile Workers Union of America, CIO:				
J. J. Pickeral, Front Royal, Va.: Senate Judiciary, Jan. 18, 1947.-----	X	X	1	\$5,200.
Arthur Schusterman: Senate Judiciary, Jan. 18, 1947 (statement).-----				
United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry.-----	-----	-----	-----	-----
United Automobile, Aircraft and Agricultural Implement Workers of America, CIO.-----	X	X	6	Not specified.
Irving Richter, legislative representative: Senate Judiciary, Jan. 18, 1947.-----	X	X	1	\$5,200.
House Judiciary, Feb. 5, 1947.-----				
Donald Montgomery, chief, Washington office: House Judiciary, Jan. 28, 1948.-----	-----	-----	-----	-----
Paul Sifton, National Legislative Representative: House Judiciary, Mar. 10 and 12, 1948.-----	-----	-----	-----	-----
Walter P. Reuther, president: Senate Judiciary, Mar. 13, 1948.-----	-----	-----	-----	-----
Senate Judiciary, statement submitted, Mar. 13, 1948.-----	-----	-----	-----	-----
United Cafeteria Workers Union.-----	-----	-----	-----	-----
United Construction Workers Organizing Committee.-----	-----	-----	-----	-----
United Electrical, Radio and Machine Workers of America, CIO:				
Russell Nixon, Washington representative: Senate Judiciary, Jan. 18, 1947.-----	X	X	4	3 at \$4,160 each; 1 at \$3,600.
Bruce Waybur: House Judiciary, Feb. 4, 1948.-----				
Ruth Young: House Judiciary, Mar. 10 and 12, 1948 (statement).-----	-----	-----	-----	-----
United Gas, Coke and Chemical Workers of America.-----	-----	-----	-----	-----
United Hatters, Caps and Millinery Workers International Union, Max Zaritsky, president: House Judiciary, Mar. 10 and 12, 1948.-----	-----	-----	-----	-----
United Mine Workers of America.-----	X	X	2	\$7,500-\$1,000.
United Office and Professional Workers of America, CIO:				
House Judiciary, statement submitted, Feb. 4, 1948.-----	X	-----	1	\$2,860.
Helen Kingery, secretary: House Judiciary, Mar. 10 and 12, 1948.-----				
United Painters and Decorators.-----	-----	-----	-----	-----

# ADMINISTRATION OF THE LOBBY REGISTRATION PROVISION 53

## LABOR—PRIVATE—Continued

	Registered		Number of employees	Salary range and notes
	1947	1948		
Pilots and Mechanics Association.....				
Rubber, Cork, Linoleum, and Plastic ers of America, CIO.....	X	X	2	\$3,840-\$11,500.
Shoe Workers of America, CIO.....	X	X	1	\$4,160.
Steelworkers of America, CIO, David T. onald, secretary-treasurer: House Judiciary, 5, 1947.	X	X	4	\$8,000-\$3,240.
ront Employees Association (San Francisco).....		X	1	\$175 per week.

## REAL ESTATE: BUILDING AND CONSTRUCTION

an Building Association.....				
an Cemetery Owners Association.....				
an Concrete Pipe Association.....				
an Institute of Real Estate Appraisers.....				
ong Cork Co. (Lancaster, Pa.).....		X	1	Not specified.
ted General Contractors of America, Inc.: E. Foreman, managing director: House udiciary, Feb. 10, 1947 (statement).				
rt L. Knowles, field engineer: House Judi- ciary, Feb. 10, 1947.				
tion of Appraisal Executives.....		X	1	\$5,500.
g Owners and Operators Association of opolitan Washington.....		X	2	\$1,500 fee and expenses.
g Products Institute.....				
l Housing Committee.....				
ction League of the United States.....				
nte Properties, Inc.....	X		1	Not specified.
Tile Institute.....				
te of Electrical Contractors.....				
te of Paint and Varnish Research.....				
te of Real Estate Management.....				
Realty Co., Lawrence Wards: Senate iary, Mar. 15, 1948 (statement).				
an Construction Co.....	X	X	2	Fee basis; \$500 retainer.
al Apartment Owners Association.....	X	X	3	Not specified; \$900-\$200.
al Association of Building Owners and agers, Robert B. Beach, executive secre- House Judiciary, Feb. 7, 1947.				
al Association of Home Builders of the d States.....	X	X	3	\$17,000-\$7,500; plus expen- ses, \$7.
al Association of Housing Manufacturers.....	X	X	1	\$7,200.
al Association of Marble Producers.....				
al Association of Master Plumbers of the d States, Inc.....				
al Association of Real Estate Boards.....	X	X	7	\$25,000-\$5,200; mostly part- time work.
altors, Washington Committee of.....		X	1	Not specified.
al Cemetery Association.....				
al Clay & Pipe Manufacturers, Inc.....				
al Door Manufacturers, Inc.....				
al Electrical Contractors Association.....	X	X	2	\$15,000-\$10,800.
al Electrical Retailers Association.....				
al Executive Committee of Housing Au- ties.....				
al Industrial Sand Association.....				
al Industrial Stores Association.....				
al Paint, Varnish and Lacquer Association, P. Ahearn: House Judiciary, Feb. 10, 1947 ment).	X	X	1	\$6,800.
al Sand and Gravel Association, Vincent hearn: House Judiciary, Feb. 10, 1947 (state- ment).				
al Slag Association.....				
al Terrazzo and Mosaic Association, Inc.....				
osidized Insulation Manufacturers Com- se.....	X		1	\$36,000.
elt Realty Corp. & Hotel.....	X		1	\$2,400.
d Mantel Contractors Association of Amer- sal Zonolite Insulation.....	X		1	Not specified; \$15 per hour for legal work.
ington Real Estate Board, Inc.....	X		1	\$8,000.
n Cemetery Alliance.....	X	X	1	Not specified; legal serv- ices.
n Defense Housing Cos.....	X		1	\$6,260.



# 54 ADMINISTRATION OF THE LOBBY REGISTRATION PROVISION

## VETERANS AND MILITARY

	Registered		Num- ber of em- ployees	Salary range and not
	1947	1948		
Air Reserve Association of the United States of America.....				
American Gold Star Mothers, Inc.....				
American Legion:				
Col. John T. Taylor, director, legislative committee:				
House Judiciary, Apr. 21, 1947.....				
House Judiciary, June 27, 1947.....				
James O'Neil, Americanization committee:				
House Judiciary, Apr. 21, 1947.....				
Jeremiah J. Towney, Americanization Committee: House Judiciary, June 27, 1947.....				
James F. Green, committee chairman: House Judiciary, June 27, 1947.....				
F. D. R. Post, Department of Kentucky, statement submitted: House Judiciary, June 27, 1947.....	X	X	5	\$10,000 to no salary.
Harry V. Hayden, Jr., legislative representative: House Judiciary, Jan. 28, 1948.....				
Charles W. Stevens, rehabilitation committee: House Judiciary, Jan. 28, 1948.....				
Harry V. Hayden, Jr., legislative representative: House Judiciary, Jan. 28, 1948 (statement).....				
House Judiciary, Apr. 21, 1948.....				
American Veterans Committee, Inc.....	X	X	2	\$5,600.
American Veterans of World War II (Amvets).....	X	X	2	\$6,000-\$4,500.
American War Mothers.....				
Amputees of World War II.....		X	1	No salary.
Army Ordnance Association.....				
Bataan Veterans Organization.....	X		1	Actual expenses.
Bureau of Rehabilitation.....				
Catholic War Veterans, Edward T. McCaffrey, chairman, executive committee: House Judiciary, July 9, 1947.....				
Coast Guard League.....	X		1	No salary.
Daughters of Union Veterans of the Civil War.....	X	X	5	\$8,250-\$4,500, plus 10 cent bonus; 3 no salary.
Disabled American Veterans.....	X	X	6	\$1,200.
Disabled Emergency Officers of the World Wars.....	X	X	1	1, \$11.52 per diem; or actual expenses or salary.
Federal Employees Veterans Association.....	X	X	1	1, secretary of group; or no salary.
Fleet Reserve Association.....	X		2	No salary.
Irish War Veterans of the United States of America.....		X	1	No salary.
Italian World War Veterans.....				
Jewish War Veterans of the United States of America, Milton H. Richman, national commander: House Judiciary, July 9, 1947 (statement).....	X	X	1	\$8,000
Legionnaire of Michigan, seventeenth district: House Judiciary, statement submitted, June 27, 1947.....				
Maryland Society, War of 1812, George W. Williams, president:				
House Judiciary, Apr. 25, 1947.....				
House Judiciary, June 25, 1947.....				
National Association of Air Forces Women.....				
National Association of Regulars.....				
National Auxiliary United Spanish War Veterans.....				
National Conference of Veteran Trainees.....	X	X	1	Expenses up to \$500 yearly.
National Council of Veterans Organizations.....				
National Headquarters of Daughters of Union Veterans of the Civil War.....				
National Society of United States Daughters of 1812.....				
Navy League of the United States.....				
Paralyzed Veterans Associations of America.....	X	X	1	Expenses only.
Philippine Veterans' Mission to the United States of America.....	X	X	1	\$3,750.
Regular Veterans Association.....	X	X	1	\$3,600.
Reserve Officers Association of the United States.....	X	X	1	\$7,200.
Reserve Officers of the Naval Services.....	X	X	2	\$10,000-\$3,000.
Retired Officers Association, Inc.....	X	X	2	\$2,400-\$1,200.
Retired Officers League.....	X	X	1	No salary.
Service Star Legion, Inc.....	X	X	2	\$25-no salary.
Society of the Cincinnati.....				

## VETERANS AND MILITARY—Continued

	Registered		Number of employees	Salary range and notes
	1947	1948		
nonye, Harry.....		X	1	Not specified; parents of deceased veterans of World War II.
ited American Veterans.....				
ited Spanish War Veterans.....				
ited Spanish War Veterans Auxiliary.....				
ited States Cavalry Association.....				
ited States Coast Artillery Association.....				
ited States Infantry Association.....				
ited War Veterans.....				
terans Aid Society, Inc.....		X	1	Expenses only.
terans Association, Federal Employees, Naval Ship Yard, New York.....		X	1	Do.
terans Committee Against Mundt-Nixon Bill.....		X	1	Volunteer worker.
terans of Foreign Wars of the United States: John D. Scott, representative: House Judiciary, April 21, 1947. } John C. Williamson, legislative service: House Judiciary, June 27, 1947. }	X	X	5	\$7,500-\$4,000.
ar Veterans in Federal Employment.....	X		1	No salary.
orld War Veterans of the United States Merchant Marine.....	X		1	Do.

## APPENDIX D

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\*This is a general list, including materials on lobbying and pressure group activities in American government, at the State as well as at the Federal level. This has been done because all experience with lobby registration legislation, prior to the Legislative Reorganization Act of 1946, was at the State level.

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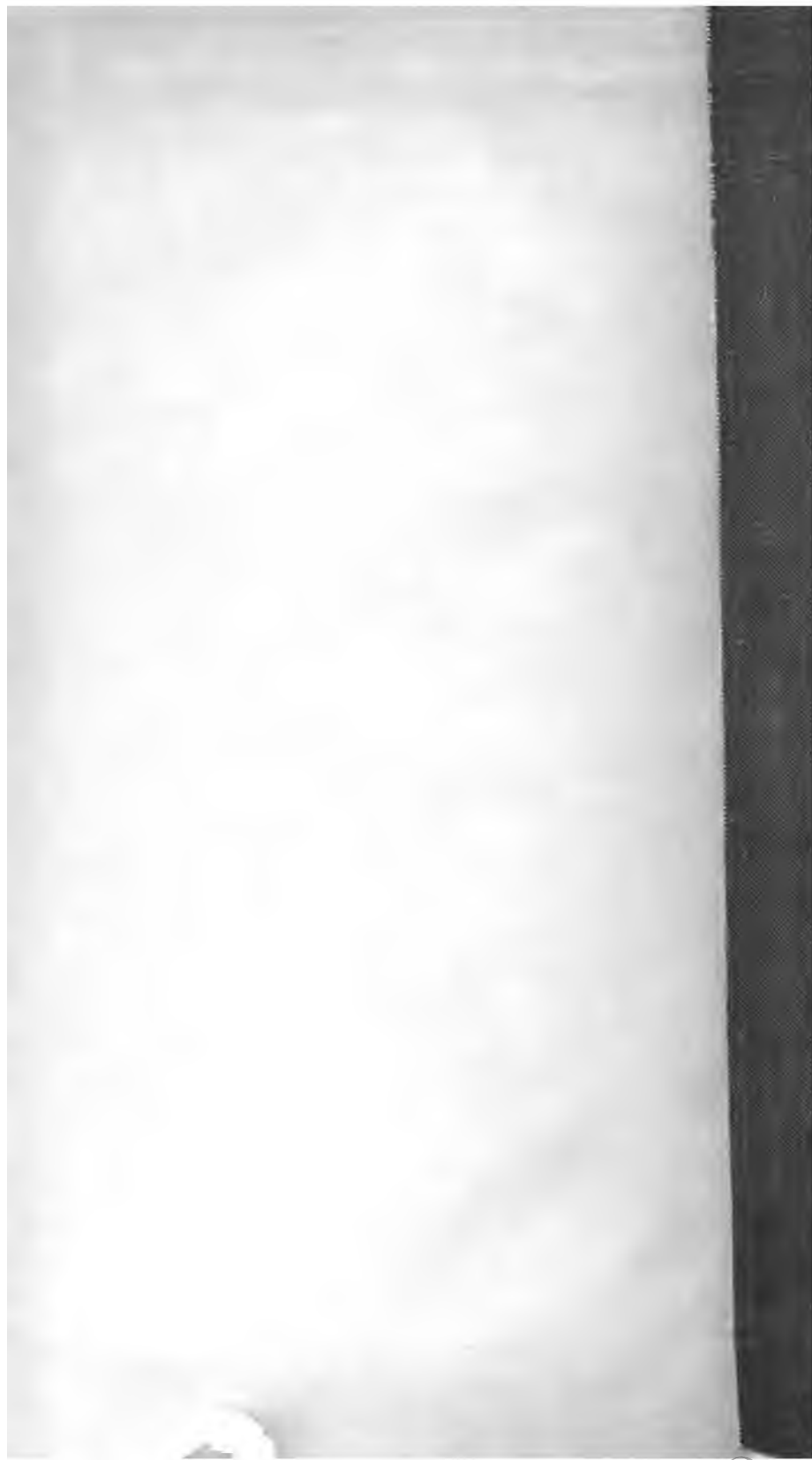
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